State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Filing at a Glance

Company: Continental Casualty Company

Product Name: PA-OP-GEN1-RA20-R1

State: Pennsylvania

TOI: LTC03I Individual Long Term Care

Sub-TOI: LTC03I.003 Other

Filing Type: Rate - Other (Not M.U. or G.I. Product)

Date Submitted: 02/23/2022

SERFF Tr Num: CNAB-133114867 SERFF Status: Closed-Approved State Tr Num: CNAB-133114867

State Status: Approved

Co Tr Num: PA-OP-GEN1-RA20-R1 (RATE ONLY)

Effective On Approval

Date Requested:

Author(s): Louis Scarim, John Munro, Mallory Noble, Peter Shugart, Ashley Kushner, Roshni Tantuwaya

Reviewer(s): Valerie Romig (primary), Jim Laverty

Disposition Date: 08/09/2022
Disposition Status: Approved

Effective Date:

State Filing Description:

Proposed 32.6% rate increase on 588 policyholders of (1) forms P1-15203-A37/-A87 known as the LTC 1 Series and (2) forms P1-18215-A37/-A87 and P1-18876-A37/-A87 known as the Premier/Classic Series.

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

General Information

Project Name: PA-OP-GEN1-RA20-R1 (RATE ONLY)

Status of Filing in Domicile: Pending

Project Number: Date Approved in Domicile:

Requested Filing Mode: Review & Approval Domicile Status Comments: This filing was submitted in our

state of domicile, Illinois, on 11/5/2021.

Explanation for Combination/Other: Market Type: Individual Submission Type: New Submission Individual Market Type:

Overall Rate Impact: 32.6% Filing Status Changed: 08/09/2022

State Status Changed: 08/09/2022

Deemer Date: Created By: Peter Shugart

Submitted By: Peter Shugart Corresponding Filing Tracking Number: CNAB-133114866

State TOI: LTC03I Individual Long Term Care

Filing Description:

Please refer to the Cover Letter in the Supporting Documentation tab.

Company and Contact

Filing Contact Information

Louis Scarim, Louis.Scarim@cna.com
151 N. Franklin Street 312-822-6179 [Phone]

Chicago, IL 60606

Filing Company Information

Continental Casualty Company CoCode: 20443 State of Domicile: Illinois
151 N. Franklin Street Group Code: 218 Company Type: Property and

Chicago, IL 60606 Group Name: CNA Insurance Casualty

(312) 822-4006 ext. [Phone] Companies State ID Number:

FEIN Number: 36-2114545

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Filing Fees

State Fees

Fee Required? No Retaliatory? No

Fee Explanation:

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Valerie Romig	08/09/2022	08/09/2022

Objection Letters and Response Letters

Objection Letters Response Letters

Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Disapproved	Valerie Romig	07/13/2022	07/13/2022	Louis Scarim	08/08/2022	08/08/2022
Disapproved	Valerie Romig	03/14/2022	03/14/2022	Peter Shugart	05/06/2022	05/06/2022

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	Response to 2/26/2022 Note To Filer	Peter Shugart	03/03/2022	03/08/2022

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
We need Excel	Note To Filer	Jim Laverty	02/26/2022	02/26/2022

 State:
 Pennsylvania
 Filing Company:
 Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Disposition

Disposition Date: 08/09/2022

Effective Date: Status: Approved

Comment: August 9, 2022

Louis Scarim Continental Casualty Company 151 N. Franklin Street Chicago, IL 60606

RE: Proposed 31% rate increase on 588 policyholders of (1) forms P1-15203-A37/-A87 known as the LTC 1 Series and (2) forms P1-18215-A37/-A87 and P1-18876-A37/-A87 known as the Premier/Classic Series.

Pennsylvania Insurance Department ID # CNAB-133114867

Dear Louis Scarim:

The Department approves the following rate increases on the above captioned forms:

- •LTC 1 policies with lifetime benefits & AIB rider: 30% in year 1; 5.9% in year 2; for a total cumulative increase of 37.7%
- •Premier/Classic policies with lifetime benefits & AIB rider: 27.3% in year 1

Sincerely,

Valerie Romig

Actuarial Associate

Bureau of Life, Accident and Health Insurance

	Overall %	Overall %	Written Premium	Number of Policy	Written	Maximum %	Minimum %
Company	Indicated	Rate	Change for	Holders Affected	Premium for	Change	Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
Continental Casualty Company	32.600%	32.600%	\$510,553	588	\$1,566,724	37.700%	27.300%

 SERFF Tracking #:
 CNAB-133114867
 State Tracking #:
 CNAB-133114867
 Company Tracking #:
 PA-OP-GEN1-RA20-R1 (RATE ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate (revised)	LTC1 Rate Supplement & Rate Sheets		Yes
Rate	Premier/Classic Rate Supplement & Rate Sheets		Yes
Rate	LTC1 Rate Supplement & Rate Sheets		No
Supporting Document	Transmittal Letter (A&H)		Yes
Supporting Document	Actuarial Certification (A&H)		Yes
Supporting Document	Actuarial Memorandum and Explanatory Information (A&H)		Yes
Supporting Document	Advertisements (A&H)		Yes
Supporting Document	Authorization to File (A&H)		Yes
Supporting Document	Insert Page Explanation (A&H)		Yes
Supporting Document	Rate Table (A&H)		Yes
Supporting Document	Replacement Form with Highlighted Changes (A&H)		Yes
Supporting Document	Advertisement Compliance Certification		Yes
Supporting Document	Reserve Calculation (A&H)		Yes
Supporting Document	Variability Explanation (A&H)		Yes
Supporting Document	Response to 2/26/2022 Note To Filer		Yes
Supporting Document	Response to 3/14/2022 Objection Letter		Yes
Supporting Document	Response to 7/13/2022 Objection Letter - Acceptance Letter		Yes

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 07/13/2022
Submitted Date 07/13/2022

Respond By Date

Dear Louis Scarim,

Introduction:

July 13, 2022

Louis Scarim Continental Casualty Company 151 N. Franklin Street Chicago, IL 60606

RE: Proposed 31% rate increase on 588 policyholders of (1) forms P1-15203-A37/-A87 known as the LTC1 Series and (2) forms P1-18215-A37/-A87 and P1-18876-A37/-A87 known as the Premier/Classic Series.

Pennsylvania Insurance Department ID # CNAB-133114867

Dear Louis Scarim:

The captioned filing has been reviewed by the Pennsylvania Insurance Department. It has been determined that the filing fails to meet the requirements of our Insurance Company Laws or regulations and is therefore disapproved pursuant to the authority granted under Section 304(a) of Act 134, the Accident and Health Filing Reform Act. In the event you have any questions regarding the stated concerns, please feel free to contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If the Department does not hear from you within 120 days, the subject filing will be permanently closed. Such filings resubmitted after 120 days must be submitted as a new filing, inclusive of appropriate filing fees and disclosure of the closed filing SERFF tracking number.

The Department is willing to approve your requested increase of (a) 34.5% on LTC1 policies with lifetime benefits and the AIB rider and (b) 27.3% on Premier/Classic policies with lifetime benefits and the AIB rider, but would recommend the increase be staged over two years. The Department would also recommend that any annual increase be limited to 30%.

Lastly, please provide a seriatim listing of the 588 Continental Casualty policies in this block in Excel. Each row within the worksheet must contain the policy's unique identification number, form number, series (i.e. LTC1 or Premier/Classic), issue age, issue date, inflation status indicator, benefit period, and Continental Casualty's suggested premium increase in each year of the proposed implementation period.

If Continental Casualty would like to accept our offer, then please respond with an acceptance letter and the seriatim listing in Excel.

Sincerely,

Valerie Romig Actuarial Associate Bureau of Life, Accident and Health Insurance

Conclusion:

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Sincerely, Valerie Romig

ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 03/14/2022
Submitted Date 03/14/2022

Respond By Date

Dear Louis Scarim, Introduction: Mar 14, 2022

Louis Scarim
Continental Casualty Company
151 N. Franklin Street
Chicago, IL 60606

RE: Proposed 31% rate increase on 588 policyholders of forms P1-15203-A37/-A87, P1-18215-A37/-A87, & P1-18876-A37/-A87. Pennsylvania Insurance Department ID #: CNAB-133114867

Dear Louis Scarim:

The captioned filing has been reviewed by the Pennsylvania Insurance Department. It has been determined that the filing fails to meet the requirements of our Insurance Company Laws or regulations and is therefore disapproved pursuant to the authority granted under Section 304(a) of Act 134, the Accident and Health Filing Reform Act. In the event you have any questions regarding the stated concerns, please feel free to contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If the Department does not hear from you within 120 days, the subject filing will be permanently closed. Such filings resubmitted after 120 days must be submitted as a new filing, inclusive of appropriate filing fees and disclosure of the closed filing SERFF tracking number.

Please furnish the following information to the Department.

- 1. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3a LTC1 Policy Forms with Lifetime Benefits & Standard Inflation) for this nationwide block of policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3a (i.e. LTC1 with Lifetime Benefits & Standard Inflation).
- 2. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3a (i.e. LTC1 with Lifetime Benefits & Standard Inflation).
- 3. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3a (i.e. LTC1 with Lifetime Benefits & Standard Inflation).
- 4. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3b Premier/Classic Policy Forms with Lifetime Benefits & Standard Inflation) for this nationwide block of policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The

ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3a (i.e. Premier/Classic with Lifetime Benefits & Standard Inflation).

- 5. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3a (i.e. Premier/Classic with Lifetime Benefits & Standard Inflation).
- 6. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3b (i.e. Premier/Classic with Lifetime Benefits & Standard Inflation).
- 7. Please provide a listing of the past requested increases and approved increases by state for this block. Also include a column showing the cumulative increases approved in each state to date.
- 8. Please provide the letter that will be sent to policyholders to inform them of the increase and their available options.
- 9. LTC1 policy forms with lifetime benefits and standard inflation are subject to a 34.5% premium increase. How many LTC1 policy forms are scheduled to receive no premium increase? In other words, the actuarial memo implies there a 354 LTC1 policy forms with lifetime benefits and standard inflation; how many LTC1 policy forms do not have lifetime benefits or do not have standard inflation benefits?
- 10. Premier/Classic policy forms with lifetime benefits and standard inflation are subject to a 27.3% premium increase. How many Premier/Classic policy forms are scheduled to receive no premium increase? In other words, the actuarial memo implies there a 234 Premier/Classic policy forms with lifetime benefits and standard inflation; how many Premier/Classic policy forms do not have lifetime benefits or do not have standard inflation benefits?
- 11. Please define what "standard inflation means". In other words, were there any policies issued with non-standard inflation options in this block?
- 12. Continental Casualty has offered the surrender option in the past. The company also offered a conversion option that provided a paid-up benefit of 100% of premium paid plus a cash payment. What is the approximate percent of policyholders that, when offered a cash surrender option, actually choose to exercise it?
- 13. The freeze and drop option eliminates future inflation indexing, maintains the current daily benefit, and lowers future premiums to the non-inflation level at the original issue age. What is the approximate average reduction in premium or what is the approximate range of premium reduction? An exact calculation is not required
- 14. Say a policyholder can purchase \$100 a day without inflation for \$350 per annum. He can purchase the same coverage with 5% compound inflation for \$750 per year. Further say that he purchases the inflation coverage for an annual premium of \$750, waits a little over 9 years until his daily benefit inflates to \$155.13 per day, and then invokes the "freeze and drop" option.

 Would his new premium be (a) \$350, (b) \$542.96 = (\$155.13/\$100)*(\$350), or (c) something else?

Sincerely,

Valerie Romig Actuarial Associate Bureau of Life, Accident and Health Insurance

Conclusion:

Sincerely,

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Valerie Romig

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Response Letter

Response Letter Status Submitted to State

Response Letter Date 08/08/2022 Submitted Date 08/08/2022

Dear Valerie Romig,

Introduction:

Response 1

Comments:

Please see the attached acceptance letter and supporting documents along with an updated rate supplement for LTC1 and a post-submission update with updated rate information on the Rate/Rule tab.

Changed Items:

No Form Schedule items changed.

Rate/Rule Schedu	ule Item Changes					
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	LTC1 Rate Supplement & Rate Sheets	P1-15203-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 37.7	2021 LTC1 Supplement to Rate Sheets - PA_v2.pdf,	08/08/2022 By: Louis Scarim
Previous Version						
1	LTC1 Rate Supplement & Rate Sheets	P1-15203-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 34.5	LTC1 Rate Supplement and Rate Sheets - PA.pdf,	02/23/2022 By: Peter Shugart

 SERFF Tracking #:
 CNAB-133114867
 State Tracking #:
 CNAB-133114867
 Company Tracking #:
 PA-OP-GEN1-RA20-R1 (RATE ONLY)

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Pennsylvania

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Supporting Document Schedule Item Changes				
Satisfied - Item: Response to 7/13/2022 Objection Letter - Acceptance Letter				
Comments:				
Attachment(s):	Response to Objection Letter (20220713) - PA OP Gen1 CNAB-133114867.pdf PA Seriatim Insured - GEN1 Final.xlsx PA Cost of Waiting Analysis - Both GEN1 & GEN2.pdf LTC1 - Infl LT - NW Equivalent LLR - 2 Year Increase.pdf			

Filing Company:

Continental Casualty Company

Conclusion:

Please let me know if you have any questions or need anything else. Thank you for your time and consideration.

Sincerely,

State:

Louis Scarim

Filing Company:

Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Pennsylvania

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Response Letter

State:

Response Letter Status Submitted to State

Response Letter Date 05/06/2022 Submitted Date 05/06/2022

Dear Valerie Romig,

Introduction:

Response 1

Comments:

Please see the attached response letter and supporting documents provided on the Supporting Documentation tab.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes				
Satisfied - Item: Response to 3/14/2022 Objection Letter				
Comments:				
Attachment(s):	Response to Objection Letter (03.14.2022) - PA OP Gen1.pdf Item 1 – Exhibit 3a_Original Rate Level.xlsx Item 4 – Exhibit 3b_Original Rate Level.xlsx Item 7 - State Status Listing - OP Gen1 (as of 05.03.2022).xlsx Item 8 – Notification_ILTC_NoRI_NW_2021 11042021.pdf Item 8 – Notification_ILTC_RI_NW_2021 11042021.pdf			

Conclusion:

Sincerely,

Peter Shugart

 SERFF Tracking #:
 CNAB-133114867
 State Tracking #:
 CNAB-133114867
 Company Tracking #:
 PA-OP-GEN1-RA20-R1 (RATE ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Amendment Letter

Submitted Date: 03/08/2022

Comments: Mr. Laverty,

Please see the Excel versions of the exhibits included under the Supporting Documentation tab. Please let us know if we can provide anything else to assist in your review.

Thanks,

Peter Shugart

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes				
Satisfied - Item:	Response to 2/26/2022 Note To Filer			
Comments:				
Attachment(s):	Exhibits 1a-4a (PA LTC1 Infl LT).xlsx Exhibits 1b-4b (PA PC Infl LT).xlsx			

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Note To Filer

Created By:

Jim Laverty on 02/26/2022 08:41 AM

Last Edited By:

Valerie Romig

Submitted On:

08/09/2022 01:50 PM

Subject:

We need Excel

Comments:

Please provide the attachments, tables, and exhibits in this filing in an Excel workbook.

Thanks.

SERFF Tracking #: CNAB-133114867 State Tracking #: CNAB-133114867

Company Tracking #: PA-OP-GEN1-RA20-R1 (RATE

ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Post Submission Update Request Processed On 08/09/2022

Status: Allowed

Created By: Peter Shugart
Processed By: Valerie Romig

Comments:

General Information:

Field Name Requested Change Prior Value

Overall Rate Impact 32.6 31

Company Rate Information:

Company Name: Continental Casualty Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	32.600%	31.000%
Overall % Rate Impact	32.600%	31.000%
Written Premium Change for this Program	n\$510553	\$485013
Maximum %Change (where required)	37.700%	34.500%

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Rate Information

Rate data applies to filing.

Filing Method: SERFF

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 7.305%

Effective Date of Last Rate Revision: 02/01/2021

Filing Method of Last Filing: SERFF

SERFF Tracking Number of Last Filing: CNAB-132346264

Company Rate Information

Company	Overall % Indicated	Overall % Rate	Written Premium Change for	Number of Policy Holders Affected	Written Premium for	Maximum % Change	Minimum % Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
Continental Casualty Company	32.600%	32.600%	\$510,553	588	\$1,566,724	37.700%	27.300%

 State:
 Pennsylvania
 Filing Company:
 Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		LTC1 Rate Supplement & Rate Sheets	P1-15203-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 37.7	2021 LTC1 Supplement to Rate Sheets - PA_v2.pdf,
2		Premier/Classic Rate Supplement & Rate Sheets	P1-18215-A37/-A87, P1- 18876-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 27.3	PC Rate Supplement and Rate Sheets - PA.pdf,

THIS POLICY IS FOR RENEWAL BUSINESS ONLY

CONTINENTAL CASUALTY COMPANY PENNSYLVANIA LTC1 Product Portfolio Supplement to Rate Sheets for Policy Forms:

P1-15203-A37/-A87

Rates in the above forms should be multiplied by the following factors:

Cumulative Rate Increase					
Automatic Increase Benefit Rider	Benefit Period	Year 1 Factor	Year 2+ Factor		
Inflation	Lifetime	3.955204	4.188561		
Inflation	Non-Lifetime	3.042464	3.042464		
Non-Inflation	Lifetime	3.042464	3.042464		
Non-Inflation	Non-Lifetime	3.042464	3.042464		

These amounts reflect the following prior approved and current rate increases:

Prior Approved Rate Increases					
Automatic Increase Benefit Rider	Benefit Period	Approval Date	Effective Date	Amount Approved	
All	All	6/28/2002	1/1/2003	15.00%	
All	All	7/10/2003	1/1/2004	40.00%	
All	All	9/2/2011	2/1/2012	11.80%	
All	All	9/2/2011	2/1/2013	11.80%	
All	All	3/23/2016	9/1/2016	20.00%	
All	All	4/3/2018	10/1/2018	9.54%	
All	All	4/3/2018	10/1/2019	9.54%	
All	All	8/22/2020	2/1/2021	5.00%	

Current Rate Increase					
Automatic Increase Benefit Rider	Benefit Period	Year 1 Amount	Year 2 Amount		
Inflation	Lifetime	30.0%	5.9%		
Inflation	Non-Lifetime	0.0%	0.0%		
Non-Inflation	Lifetime	0.0%	0.0%		
Non-Inflation	Non-Lifetime	0.0%	0.0%		

THIS POLICY IS FOR RENEWAL BUSINESS ONLY

CONTINENTAL CASUALTY COMPANY PENNSYLVANIA

Premier/Classic Product Portfolio Supplement to Rate Sheets for Policy Forms:

P1-18215-A37/-A87 P1-18876-A37/-A87

Rates in the above forms should be multiplied by the following factors:

Cumulative Rate Increase				
Automatic Increase Benefit Rider	Benefit Period	Factor		
Inflation	Lifetime	3.608438		
Inflation	Non-Lifetime	2.834594		
Non-Inflation	Lifetime	2.834594		
Non-Inflation	Non-Lifetime	2.834594		

These amounts reflect the following prior approved and current rate increases:

Prior Approved Rate Increases					
Automatic Increase Benefit Rider	Benefit Period	Approval Date	Effective Date	Amount Approved	
All	All	7/10/2003	1/1/2004	50.00%	
All	All	9/2/2011	2/1/2012	11.80%	
All	All	9/2/2011	2/1/2013	11.80%	
All	All	3/23/2016	9/1/2016	20.00%	
All	All	4/3/2018	10/1/2018	9.54%	
All	All	4/3/2018	10/1/2019	9.54%	
All	All	8/22/2020	2/1/2021	5.00%	

Current Rate Increase				
Automatic Increase Benefit Rider	Benefit Period	Amount		
Inflation	Lifetime	27.3%		
Inflation	Non-Lifetime	0.0%		
Non-Inflation	Lifetime	0.0%		
Non-Inflation	Non-Lifetime	0.0%		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		18	23	31
45-49		20	26	34
50-54		24	31	43
55-59		31	42	58
60-64		48	64	88
65		58	78	108
66		62	84	117
67		67	92	128
68		73	100	139
69		80	111	153
70		88	122	168
71		96	134	185
72 72		106	149	206
73		117	166	229
74 75		130	184	254
75 76		145	206	282
76 77		160	228	312
7 <i>7</i> 78		177	252 270	345
78 79		195 214	279 207	380 410
80	168	235	30 7	418
81	186	256		
82	203	279		
83	224	309		
84	246	338		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		21	28	38
45-49		24	31	43
50-54		28	38	53
55-59		36	49	6 8
6 0-64		53	72	99
65		65	88	122
66		69	95	133
67		75	104	145
68		82	114	158
69		89	124	173
70		98	137	190
71		107	150	209
72		118	167	232
73		130	186	258
74		144	207	286
75 76		160	230	318
76		177	256	352
77		196	283	388
78 70		215	313	428
79	104	236	343	470
80	184	258		
81	204	282		
82	223	307		
83	246	339		
84	269	371		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 4 5-4 9		25 28	35 39	50 55
50-54		36	50	71
55-59		47	66	96
60-64		69	97	139
65		84	119	172
66		90	128	185
67		98	139	201
68		106	152	219
69		116	166	239
70		126	181	260 285
71		137	198	312
72		150	218	343
73		164	240	343 377
74		181	264	413
75		199	291 320	452
76		218	350 350	495
77		239 260	383	540
78 70		282	418	588
79	215	305	410	300
80	234	329		
81	254 253	354		
82 83	276	386		
84	298	418		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

I SSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460× LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		31	43	60
45-49		34	48	67
50-54		42	60	84
55-59		54	77	111
60-64		77	110	156
65		94	134	193
66	•	101	145	207
67		110	157	225
68		119	171	245
69		129	186	267
70		140	203	291
71		153	222	318
72		167	244	349
73		183	269	383
74		201	295	420
75		220	325	461
76		241	356	504
77		264	390	551
78		286	427	601
79		310	465	654
80	236	336		
81	257	362		
82	278	389		
83	303	424		
84	327	458		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A37 Long-Term Care Policy

Annual Premium per \$10 of Long-Term Care Daily Benefit

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		34	47	67
45-49		37	52	74
50-54		46	65	94
55-59		59	84	122
60-64		82	116	167
65		99	141	202
66		105	150	216
67		113	162	233
68		122	175	252
69		132	190	271
70		142	205	293
71		154	223	318
72		167	242	346
73		181	264	377
74		198	289	411
75		216	316	448
76		235	345	487
77		256	376	530
78		276	409	575
79		298	444	623
80	226	321		
81	245	345		
82	264	370		
83	286	401		
84	309	432		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A37 Long-Term Care Policy

Long-Term Care Policy
Annual Premium per \$10 of Long-Term Care Daily Benefit

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= MAXIMUM= 730x LTC 1460x LTC BENEFIT/DAY BENEFIT/DAY		MAXIMUM= UNLIMITED
18-44		40	57	80
45-49		44	63	88
50-54		54	77	110
55 -59		67	97	139
60-64		92	131	188
65		111	158	227
66		118	170	242
67		127	183	261
68		136	197	281
69		147	213	303
70		158	230	328
71		172	250	356
72		186	272	387
73		201	297	422
74		219	324	459
75		240	354	499
76		261	385	543
77		283	419	590
78		306	456	640
79		329	494	693
80	249	354		
81	269	380		
82	290	406		
83	314	440		
84	337	473		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		23	29	39
45-49		25	33	43
50-54		30	39	54
55-5 9		39	53	73
60-64		60	80	110
65		73	98	135
66		78	105	146
67		. 84	115	160
6 8		91	125	174
69		100	139	191
70		110	153	210
71		120	168	231
72		133	186	258
73		146	208	286
74		163	230	318
75		181	258	353
76		200	285	390
77		221	315	431
78		244	349	475
79	- 4 -	268	384	523
80	210	294		
81	233	320		
82	254	349		
83	280	386		
84	308	423		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		26	35	48
45-49		30	39	54
50-54		35	4 8	66
55-59		45	61	85
60-64		6 6	90	124
65		81 .	110	153
66		86	119	166
67		94	130	181
68		103	143	198
69		111	155	216
70		123	171	238
71		134	188	261
72		148	209	290
73		163	233	323
74		180	259	358
75		200	288	398
76		221	320	440
77		245	354	485
78		269	391	535
79		295	429	588
80	230	323		
81	255	353		
82	279	384		
83	308	424		
84	336	464		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		31	44	63
45-49		35	49	69
50-54		45	63	89
55-59		59	83	120
60-64		86	121	174
65		105	149	215
66		113	160	231
67		123	174	251
68		133	190	274
69		145	208	299
70		158	226	325
71		171	248	356
72		188	273	390
73		205	300	429
74		226	330	471
75 76		249	364	516
76 77		273	400	565
77		299	438	619
78 70		325	479	675
79	0.45	353	52 3	735
80	269	381		
81	293	411		
82	316	443		
83	345	483		
84	373	523		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= MAXIMUM 730x LTC 1460x LT BENEFIT/DAY BENEFIT/D		MAXIMUM= UNLIMITED
18-44		39	54	75
45-49		43	60	84
50-54		53	75	105
55-59		68	96	139
60-64		96	138	195
65		118	168	241
66		126	181	259
67		138	196	281
6 8		149	214	306
69		161	233	334
70		175	254	364
71		191	278	398
72		209	305	436
73		229	336	479
74		251	369	525
75		275	406	576
76		301	445	630
77		330	488	689
78		358	534	751
79		388	581	818
80	295	420		
81	321	453		
82	348	486		
83	379	530		
84	409	573		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79	365x LTC BENEFIT/DAY	730x LTC BENEFIT/DAY 43 46 58 74 103 124 131 141 153 165 178 193 209 226 248 270 294 320 345 373		MAXIMUM= UNLIMITED 84 93 118 153 209 253 270 291 315 339 366 398 433 471 514 560 609 663 719 779
80 81 82 83 84	283 306 330 358 386	401 431 463 501 540		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A37 Long-Term Care Policy

Long-Term Care Policy
Annual Premium per \$10 of Long-Term Care Daily Benefit

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE	MAXIMUM= 365x LTC	MAXIMU M = 730x LTC	MAXIMUM= 1460x LTC	MAXIMUM=
AGE	BENEFIT/DAY	BENEFIT/DAY	BENEFIT/DAY	UNLIMITED
18-44		50	71	100
45-49		55	79	110
50-54		68	96	138
55-59		84	121	174
60-64		115	164	235
65		139	198	284
66		148	213	303
6 7		159	229	326
68		170	246	351
69		184	266	379
70		19 8	288	410
71		215	313	445
72		233	340	484
73		251	371	528
74		274	405	574
75		300	443	624
76		326	481	679
77		354	524	738
78		383	570	800
79		411	618	866
80	311	44 3		
81	336	47 5		
82	363	50 8		
83	393	550		
84	421	59 1		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A37 Long-Term Care Policy Other Optional Riders

Benefit Eligibility Amendment Rider R1-18223-Series

If Rider R1-18223-Series is present, multiply policy premium by 1.05.

Guaranteed Insurability Option Rider R1-18224-Series

If Rider R1-18224-Series is present, multiply policy premium by appropriate factor from the following table:

<u>Issue Age</u>	<u>Factor</u>
18-44	1.15
45-49	1.15
50-54	1.15
55-59	1.15
60-64	1.15
65	1.15
66	1.15
67	1.14
68	1.13
69	1.12
70	1.11
71	1.10
72	1.08
73	1.06

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A37 Long-Term Care Policy

Health Rating Group Factors

Rates shown are for Preferred Rating Group and Standard Rating Group. Rates for Health Groups II and III are calculated by multiplying Standard rates by 1.20 and 1.40, respectively.

Elimination Period Factors

Rates shown are for 0 day elimination period. Rates for longer elimination periods are calculated by multiplying the 0 day rates by the appropriate factor from the following table:

Benefit <u>Maximum</u>	<u>30</u>	<u>60</u>	<u>90</u>	<u>180</u>	<u>365</u>
365x,730x 1460x Unlimited	0.89 0.91 0.93	0.84 0.86 0.89	0.82	0.72	0.60 0.63 0.70

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A37 Long-Term Care Policy

SPOUSAL DISCOUNT

A 10% discount to the rates will be made if the following conditions are met:

- Discount is applicable to all lives regardless of Health Group.
 If both spouses apply for coverage simultaneously and are both issued, discount applies to both policies.

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83	168 186 203 224	18 20 24 31 48 58 62 67 73 80 88 96 106 117 130 145 160 177 195 214 235 256 279 309	23 26 31 42 64 78 84 92 100 111 122 134 149 166 184 206 228 252 279 307	31 34 43 58 88 108 117 128 139 153 168 185 206 229 254 282 312 345 380 418
84	246	338		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84	184 204 223 246 269	21 24 28 36 53 65 69 75 82 89 98 107 118 130 144 160 177 196 215 236 258 282 307 339 371	28 31 38 49 72 88 95 104 114 124 137 150 167 186 207 230 256 283 313 343	38 43 53 68 99 122 133 145 158 173 190 209 232 258 286 318 352 388 428 470

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	215 234 253	25 28 36 47 69 84 90 98 106 116 126 137 150 164 181 199 218 239 260 282 305 329 354	35 39 50 66 97 119 128 139 152 166 181 198 218 240 264 291 320 350 383 418	50 55 71 96 139 172 185 201 219 239 260 285 312 343 377 413 452 495 540 588
83 84	276 298	386 418		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE _AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		31	43	60
45-49		34	48	67
50-54 55-50		42	60	84
55-59		54	77	111
60-64		77	110	156
65 66		94	134	193
66 67		101	145	207
67		110	157	225
68 69		119	171	245
70		129	186	267
70 71		140	203	291
71 72		153	222	318
73		167	244	349
73 74		183	269	383
7 5		201	295	420
75 76		220	325	461
70 77		241	356	504
77 78		264	390	551
79		286	427	601
80	236	310	465	654
81	257	336		
82	278	362 300		
83	303	389 424		
84	303 327	424		
07	34/	458		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		34	47	67
45-49		37	52	74
50-54		46	65	94
55-5 9		59	84	122
60-64		82	116	167
65		99	141	202
66		105	150	216
67		113	162	233
68		122	175	252
69		132	190	271
70		142	205	293
71		154	223	318
72		167	242	346
73		181	264	377
74		1 9 8	289	411
75 76		216	316	448
76		235	345	487
77		256	376	530
78 70		276	409	575
79		298	444	623
80	226	321		
81	245	345		
82	264	370		
83	286	401		
84	309	432		

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	249 269 290	40 44 54 67 92 111 118 127 136 147 158 172 186 201 219 240 261 283 306 329 354 380 406	57 63 77 97 131 158 170 183 197 213 230 250 272 297 324 354 385 419 456 494	80 88 110 139 188 227 242 261 281 303 328 356 387 422 459 499 543 590 640 693
82 83 84	290 314 337	406 440 473		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84	210 233 254 280 308	23 25 30 39 60 73 78 84 91 100 110 120 133 146 163 181 200 221 244 268 294 320 349 386 423	29 33 39 53 80 98 105 115 125 139 153 168 186 208 230 258 285 315 349 384	39 43 54 73 110 135 146 160 174 191 210 231 258 286 318 353 390 431 475 523

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT

18-44 26 35 48 45-49 30 39 54 50-54 35 48 66 55-59 45 61 85 60-64 66 90 124 65 81 110 153 66 86 119 166 67 94 130 181 68 103 143 198 69 111 155 216 70 123 171 238 71 134 188 261 72 148 209 290 73 163 233 323 74 180 259 358 75 200 288 398 76 221 320 440 77 245 354 485 78 269 391 535 79 295 429 588 80 230 323 81 255 353 <t< th=""><th>ISSUE AGE</th><th>MAXIMUM= 365x LTC BENEFIT/DAY</th><th>MAXIMUM= 730x LTC BENEFIT/DAY</th><th>MAXIMUM= 1460x LTC BENEFIT/DAY</th><th>MAXIMUM= UNLIMITED</th></t<>	ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
84 336 464	45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83	255 279 308	30 35 45 66 81 86 94 103 111 123 134 148 163 180 200 221 245 269 295 323 353 353 384 424	39 48 61 90 110 119 130 143 155 171 188 209 233 259 288 320 354 391	54 66 85 124 153 166 181 198 216 238 261 290 323 358 398 440 485 535

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	269 293 316	31 35 45 59 86 105 113 123 133 145 158 171 188 205 226 249 273 299 325 353 381 411	44 49 63 83 121 149 160 174 190 208 226 248 273 300 330 364 400 438 479 523	63 69 89 120 174 215 231 251 274 299 325 356 390 429 471 516 565 619 675 735
83 84	345 373	483 523		•

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18225-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		39	54	75
45-49		43	60	84
50-54		53	75	105
55-59		68	96	139
60-64		96	138	195
65		118	168	241
66		126	181	259
67		138	196	281
68		149	214	306
69 70		161	233	334
70 71		175	254	364
71 72		191	278	398
73		209	305	436
73 74		229	336	479
7 4 75		251	369	525
75 76		275	406	576
7 0 7 7		301	445	630
78		330 358	488	689
79		388	534 501	751 212
80	295	420	581	818
81	321	453		
82	348	486		
83	379	530		
84	409	573		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 50% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460x LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44		43	59	84
45-49		46	65	93
50-54		58	81	118
55-59		74	105	153
60-64		103	145	209
65		124	176	253
66		131	188	270
67		141	203	291
68		153	219	315
69 70		165	238	339
70 71		178	256	366
71 72		193	279	398
72 73		209	303	433
73 74		226	330	471
74 75		248	361	514
75 76		270	395	560
76 77		294	431	609
77 78		320	470	663
78 79		345	511	719
80	283	373	555	779
81	306	401		
82	330	431		
83	358	463 501		
84	386	501 540		

STANDARD RATING GROUP O DAY ELIMINATION PERIOD HOME AND COMMUNITY BASED CARE MAXIMUM DAILY BENEFIT= 100% OF LONG-TERM CARE DAILY BENEFIT AMOUNT WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18226-SERIES

ISSUE AGE	MAXIMUM= 365x LTC BENEFIT/DAY	MAXIMUM= 730x LTC BENEFIT/DAY	MAXIMUM= 1460× LTC BENEFIT/DAY	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	311 336 363	50 55 68 84 115 139 148 159 170 184 198 215 233 251 274 300 326 354 383 411 443 475 508	71 79 96 121 164 198 213 229 246 266 288 313 340 371 405 443 481 524 570 618	100 110 138 174 235 284 303 326 351 379 410 445 484 528 574 624 679 738 800 866
83 84	393 421	550 591		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A87 Long-Term Care Policy Other Optional Riders

Benefit Eligibility Amendment Rider R1-18223-Series

If Rider R1-18223-Series is present, multiply policy premium by 1.05.

Guaranteed Insurability Option Rider R1-18224-Series

If Rider R1-18224-Series is present, multiply policy premium by appropriate factor from the following table:

<u>Issue Age</u>	Factor
18-44	1.15
45-49	1.15
50-54	1.15
55-59	1.15
60-64	1.15
65	1.15
66	1.15
67	1.14
68	1.13
69	1.12
70	1.11
71	1.10
72	1.08
73	1.06

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A87 Long-Term Care Policy

Health Rating Group Factors

Rates shown are for Preferred Rating Group and Standard Rating Group. Rates for Health Groups II and III are calculated by multiplying Standard rates by 1.20 and 1.40, respectively.

Elimination Period Factors

Rates shown are for 0 day elimination period. Rates for longer elimination periods are calculated by multiplying the 0 day rates by the appropriate factor from the following table:

Benefit <u>Maximum</u>	<u>30</u>	<u>60</u>	<u>90</u>	<u>180</u>	<u>365</u>
365x,730x	0.89	0.84	0.80	0.72	0.60
1460x	0.91	0.86	0.82		0.63
Unlimited	0.93	0.89	0.86		0.70

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18215-A87 Long-Term Care Policy

FRANCHISE ASSOCIATION FACTORS

A. The rates will be multiplied by a factor of .90 if the following conditions are met:

For Associations of 200 lives or more:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. Minimum of 10 lives must be submitted.
- B. The rates will be multiplied by a factor of .95 if the following conditions are met:

For Associations of less than 200 lives:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. Minimum of 10 lives must be submitted.

SPOUSAL DISCOUNT

A 10% discount to the rates will be made if the following conditions are met:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. If both spouses apply for coverage simultaneously and are both issued, discount applies to both policies.

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	14	17	18	21 23
45-49	15	19	20	31
50-54	20	26	28	44
55-59	27	36	40	71
60-64	45	58	65 91	88
65	55	72	81	96
66	60	78	88	105
67	65	85	96 105	115
68	71	94	105	126
69	77	102	116	138
70	85	112	128	152
71	94	124	140	169
72	105	139	156	109
73	116	155	175	189
74	128	173	196	210
75	144	194	218	233
76	160	216	242	258
77	177	240	269	286
78	196	266	298	316
79	215	29 3	330	349
80	237			
81	260			
82	284			
83	315			
84	347			

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	21	28	31	35
45-49	24	31	35	39
50-54	31	42	48	54
55-5 9	43	59	68	77
	66	89	103	115
60-64 65	82	111	128	143
66	88	120	139	154
67	96	131	151	167
68	105	143	166	183
69	114	156	181	199
70	125	171	198	217
70 71	137	187	217	238
71 72	150	207	239	261
73	165	228	264	287
73 74	181	252	291	315
74 75	201	278	320	347
	220	306	352	381
76	241	337	386	417
77 70	264	369	422	455
78 70	286	404	462	496
79	310			
80	310 337			
81	363			
82				
83	397 422			
84	432			

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	29	39	45	50
45-49	32	43	50	55
50-54	43	57	65 .	73
55-59	56	76	88	98
60-64	81	108	125	138
65	98	132	153	168
66	105	142	164	180
67	112	153	177	195
68	122	166	191	211
69	131	179	207	227
70	142	195	224	246
71	. 154	212	244	267
72	167	231	266	291
73	182	253	291	317
74	1 99	277	319	346
75	218	303	349	377
76	238	332	380	411
77	259	362	415	447
78	281	394	451	485
79	303	429	491	526
80	328			
81	353			
82	379			
83	413			
84	446			

STANDARD RATING GROUP O DAY ELIMINATION PERIOD

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	18	21	23	26 20
45-49	19	24	25	29
50-54	25	33	35	39 55
55-59	34	45	50	89
60-64	56	73	81	110
65	69	90	101	120
66	75	98	110	131
6 7	81	106	120	144
68	89	118	131	158
69	96	128	145	173
70	106	140	160	173
71	118	155	175	211
72	131	174	195	236
73	145	194	219	263
74	160	216	245	203 291
75	180	243	273	323
76	200	270	303	358
77	221	300	336	395
78	245	333	373	436
79	269	366	413	430
80	296			
81	325			
82	355			
83	394			
84	434			

STANDARD RATING GROUP O DAY ELIMINATION PERIOD WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	26	35	39	44
45-49	30	39	44	49
50-54	39	53	60	68
55-59	54	74	85	96
60-64	83	111	129	144
65	103	139	160	179
66	110	150	174	193
67	120	164	189	209
68	131	179	208	229
69	143	195	226	249
70	156	214	248	271
71	171	234	271	298
72	188	259	299	326
73	206	285	330	359
74	226	315	364	394
75	251	348	400	434
76	275	383	440	476
77	301	421	483	521
78	330	461	528	569
79	358	505	578	620
80	388 • · ·			
81	421			
82	454			
83	496			
84	540			

STANDARD RATING GROUP O DAY ELIMINATION PERIOD WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	36	49	56	63
45-49	40	54	63	69
50-54	54	71	81	91
55-59	70	95	110	123
60-64	101	135	156	173
65	123	165	191	210
66	131	178	205	225
67	140	191	221	244
68	153	208	239	264
69	164	224	259	284
70	178	244	280	308
71	193	265	305	334
72	209	289	333	364
73	228	316	364	396
74	249	346	399	433
75	273	379	436	471
76	298	415	475	514
77	324	453	519	559
78	351	493	564	606
79	379	536	614	658
80	410			
81	441			
82	474			
83	516			
84	558			

O DAY ELIMINATION PERIOD 1 YEAR BENEFIT PERIOD FOR AGES 80-84

ISSUE AGE	WITH NO AUTOMATI PREFERRED	C INCREASE STANDARD
80	166	208
81	183	229
82	199	249
83	221	277
84	243	304
ISSUE	WITH SIMPLE AUTOMA	TIC INCREASE
AGE	PREFERRED	STANDARD
00	017	271
80	217	
81	236	295
82	254	318
83	278	348
84	302	378
ISSUE		MATIC INCREASE
AGE	PREFERRED	STANDARD
80	230	288
81	248	310
82	265	331
83	289	361
84	312	390
U-T		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for first \$50 of Home Care Daily Benefit

PREFERRED RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81	81 90 102 121 161 197 210 225 244 262 283 307 332 359 388 420 455 493 534 577 624 673 726 789	111 123 139 166 220 269 287 309 333 359 388 421 455 494 534 578 625 675 728 785	126 140 159 189 251 306 328 353 380 411 444 481 521 566 612 662 716 772 830 893
84	852		

CONTINENTAL CASUALTY COMPANY

Rate Sheet For P1-18876-A37
Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44	123	168	192
45-49	137	187	213
50-54	158	216	247
55-59	202	277	316
60-64	258	352	402
65	293	402	459
66	308	422	482
67	327	447	511
68	348	477	546
69	375	513	586
70	4 04	553	631
71	436	596	681
72	469	642	733
73	501	689	789
74	539	741	848
75	580	796	911
76	624	855	977
77	668	915	1046
78	714	9 78	1117
79	764	1044	1191
80	815		
81	869		
82	927		
83	994		
84	1060		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for first \$50 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78	750 DAYS 153 170 194 239 294 334 350 368 391 417 447 480 514 546 585 627 669 714 759	•	
79 80 81 82 83 84	807 858 911 965 1030 1096	1103	1202

CONTINENTAL CASUALTY COMPANY

Rate Sheet For P1-18876-A37

Long-Term Care Policy

HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES

Annual Premium for extra \$10 of Home Care Daily Benefit

PREFERRED RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	12 13 14 16 23 28 30 32 35 37 40 43 47 51 54 60 64 69 75 81 89 95	16 18 19 23 31 38 41 43 48 50 54 59 65 70 75 82 88 95 102 109	18 20 22 27 35 43 46 49 54 57 62 68 74 80 86 93 101 108 116 124
83 84	110 120		

CONTINENTAL CASUALTY COMPANY

Rate Sheet For P1-18876-A37
Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for extra \$10 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE	MAXIMUM=	MAXIMUM=	MAXIMUM=
AGE	750 DAYS	1500 DAYS	UNLIMITED
18-44	17	24	27
45-49	20	27	30
50-54	22	30	34
55-59	29	40	45
60-64	37	50	56
65	41	56	64
66	44	59	67
67 68	46 48	63 66 72	72 76 82
69 70 71	53 56 61	72 77 84	89 96
72	67	91	103
73	70	97	111
74	77	105	119
75	82	112	128
76 77	87 94	- 120 129 137	137 147 157
78 79 80	100 107 115	146	167
81 82	122 130		
83 84	139 150		

Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for extra \$10 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44	22	30	34 38
45-49	24	33 37	42
50-54	28	37 46	53
55-59 60-64	33 41	46 57	65
60-64	46	64	73
65 66	4 0 48	67	73
67	40 52	71	81
68	52 54	75	86
69	59 59	81	92
70	62	85	98
70 71	. 67	92	105
72	72	98	112
73	7 6	105	120
74	83	113	129
75	87	120	138
76	93	129	148
77	100	137	157
78	106	146	167
79	113	156	179
80	121	200	
81	128		
82	136		
83	145		
84	154		

Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

STANDARD RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
		139 154 174 208 275 336 359 386 416 449 485 526 569 618 668 723 781 844 910 981	158 175 199 236 314 383 410 441 475 514 555 601 651 708 765 828 895 965 1038 1116
82 83 84	908 986 1065		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

STANDARD RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80	750 DAYS 154 171 198 253 323 366 385 409 435 469 505 545 586 626 674 725 780 835 893 955 1019		240 266 309 395 503 574 603 639 683 733 789 851 916 986 1060 1139 1221 1308 1396 1489
81 82 83 84	1086 1159 1243 1325		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

STANDARD RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49	191 213	261 290	298 331
50-54	243	333	380
55-59	299	409	468
60-64	368	505	578
6 5	418	570	651
66	438	598	683
67	460	629	719
68	489	669	764
69	521	714	816
70	559	765	874
71	600	820	936
72	643	880	1005
73	683	939	1076
74	731	1004	1149
75	784	1075	1229
76	836	1146	1311
77	893	1223	1396
78	949	1299	1484
79	1009	1381	1578
80	1073		
81	1139		
82	1206		
83	1288		
84	1370		

CONTINENTAL CASUALTY COMPANY

Rate Sheet For P1-18876-A37
Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

STANDARD RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81	15 16 18 20 29 35 38 40 44 46 50 54 59 64 68 75 80 86 94 101 111 119	20 23 24 29 39 48 51 54 60 63 68 74 81 88 94 103 110 119 128 136	23 25 28 34 44 54 58 61 68 71 78 85 93 100 108 116 126 135 145
82 83 84	128 138 150		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

STANDARD RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80	750 DAYS 21 25 28 36 46 51 55 58 60 66 70 76 84 88 96 103 109 118 125 134 144	30 34 38 50 63 70 74 79 83 90 96 105 114 121 131 140 150 161 171 183	34 38 43 56 70 80 84 90 95 103 111 120 129 139 149 160 171 184 196 209
81 82 83 84	153 163 174 188		

CONTINENTAL CASUALTY COMPANY

Rate Sheet For P1-18876-A37
Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

STANDARD RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE	MAXIMUM=	MAXIMUM=	MAXIMUM=
AGE	750 DAYS	1500 DAYS	UNLIMITED
18-44 45-49	28 30	38 41 46	43 48 53
50-54 55-59	35 41	58	66
60-64	51	71	81
65	58	80	91
66	60	84	96
67	65	89	101
68	68	94	108
	74	101	115
69 70	78	106	123 131
71	84	115	140
72	90	123	
73	95	131	150
74	104	141	161
75	109	150	173
76	116	161	185
77	125	171	196 209
78	133	183	224
7 9	141	1 9 5	
80 81	151 160		
82 83	170 181		
84	193		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A37 Long-Term Care Policy Other Optional Rider

Guaranteed Insurability Option Rider R1-18884-Series

If Rider R1-18884-Series is present, multiply policy premium by appropriate factor from the following table: $\frac{1}{2}$

Issue Age	<u>Factor</u>
18-44	1.15
45-49	1.15
50-54	1.15
55-59	1.15
60-64	1.15
65	1.15
66	1.15
67	1.14
68	1.13
69	1.12
70	1.11
7 1	1.10
72	1.08
73	1.06
/ 🕽	**00

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A37 Long-Term Care Policy

Health Rating Group Factors

Rates shown are for Preferred Rating Group and Standard Rating Group. Rates for Health Groups II and III are calculated by multiplying Standard rates by 1.20 and 1.40, respectively.

Elimination Period Factors

Rates shown are for 0 day elimination period. Rates for longer elimination periods are calculated by multiplying the 0 day rates by the appropriate factor from the following table:

Benefit <u>Maximum</u>	<u>30</u>	<u>60</u>	90	<u>180</u>	<u>365</u>
1 year,2 year 4 year,6 year Lifetime	0.91	0.86	0.80 0.82 0.86	0.72	0.60 0.63 0.70

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A37 Long-Term Care Policy

SPOUSAL DISCOUNT

A 10% discount to the rates will be made if the following conditions are met:

- Discount is applicable to all lives regardless of Health Group.
 If both spouses apply for coverage simultaneously and are both issued, discount applies to both policies.

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	14	17	18	21
45-49 50-54	15	19	20	23
50-54	20	26	28	31
55-59	27	36	40	44
60-64	45	58	65	71
65	55	72	81	88
66	60	78	88	96
67	65	85	9 6	105
68	71	94	105	115
69	77	102	116	126
70	85	112	128	138
71	94	124	140	152
72	105	13 9	156	169
73	116	155	175	189
74	128	173	196	- 210
75	144	194	218	233
76	160	216	242	258
77	177	240	269	286
78	196	266	298	316
79	215	293	330	349
80	237	-233	330	343
81	260			
82	284			
83	315			
84	347			
-	34/			

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD WITH SIMPLE AUTOMATIC INCREASE RIDER RI-18880-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	21	28	31	35
45-49	24	31	35	39
50-54	31	42	48	5 4
55-59	43	5 9	68	77
60-64	66	8 9	103	115
65	82	111	128	143
66	88	120	139	154
67	96	131	151	167
68	105	143	166	183
69	114	15 6	181	199
70	125	171	198	217
71	137	187	217	238
72	150	207	239	261
73	165	228	264	287
74	181	252	291	- 315
75	201	278	320	347
76	220	306	352	381
77	241	337	386	417
78	264	3 6 9	422	455
79	286	404	462	496
80	310			130
81	337			
82	363			
83	397			
84	432			

PREFERRED RATING GROUP O DAY ELIMINATION PERIOD WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= _4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	29 32 43 56 81 98 105 112 122 131 142 154 167 182 199 218 238 259 281 303 328 353 379			
83 84	413 446			

STANDARD RATING GROUP O DAY ELIMINATION PERIOD

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79				
80 81 82 83 84	296 325 355 394 434		,,,,	430

STANDARD RATING GROUP O DAY ELIMINATION PERIOD WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	26	35	39	44
45-49	30	39	44	49
50-54	39	53	60	68
5 5 -59	54	74	85	96
60-64	83	111	129	144
65	103	139	160	179
6 6	110	150	174	193
67	120	164	189	209
68	131	179	208	229
69	143	195	226	249
7 0	156	214	248	271
71	171	234	271	298
72	188	259	299	326
73	206	285	330	359
74	226	315	364	- 394
75	251	348	400	434
76	275	383	440	476
77	301	421	483	521
78	330	461	528	5 69
.79	358	505	578	620
80	388			
81	421			
82	454			
83	496			
84	540			

STANDARD RATING GROUP O DAY ELIMINATION PERIOD WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 2 YEARS	MAXIMUM= 4 YEARS	MAXIMUM= 6 YEARS	MAXIMUM= UNLIMITED
18-44	36	49	56	63
45-49	40	54	63	69
50-54	54	71	81	91
55-59	70	95	110	123
60-64	1 01	135	156	173
65	123	165	191	210
6 6	131	178	205	225
67	140	191	221	244
68	153	208	239	264
69	164	224	259	284
70	178	244	280	308
71	193	265	305	334
7 2	209	289	333	364
73	2 28	316	364	396
74	249	346	399	- 43 3
75	273	379	436	471
76	298	415	475	514
77	3 24	45 3	519	5 59
78	351	493	564	606
_. 79	379	536	614	658
80	410			
81	441			
82	474			
83	516			
84	558			

O DAY ELIMINATION PERIOD 1 YEAR BENEFIT PERIOD FOR AGES 80-84

ISSUE AGE	WITH NO AUTOMATI PREFERRED	C INCREASE STANDARD
80 81 82 83 84	166 183 199 221 243	208 229 249 277
ISSUE AGE	WITH SIMPLE AUTOMA PREFERRED	304 TIC INCREASE STANDARD
80 81 82 83 84	217 236 254 278 302	271 295 318 348 378
ISSUE AGE	WITH COMPOUND AUTO	MATIC INCREASE STANDARD
80 81 82 83 84	230 248 265 289 312	288 310 331 361 390

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A87 Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

PREFERRED RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83	81 90 102 121 161 197 210 225 244 262 283 307 332 359 388 420 455 493 534 577 624 673 726 789	111 123 139 166 220 269 287 309 333 359 388 421 455 494 534 578 625 675 728 785	126 140 159 189 251 306 328 353 380 411 444 481 521 566 612 662 716 772 830 893
84	852		

Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	123 137 158 202 258 293 308 327 348 375 404 436 469 501 539 580 624 668 714 764 815 869 927	168 187 216 277 352 402 422 447 477 513 553 596 642 689 741 796 855 915 978 1044	
83 84	994 1060		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for first \$50 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44	153	209	238
45-49 50-54	170	232	265
50-54 55 50	194	266	304
55-59	239	327	374
60-64	294	404	462
65 66	334	456	521
66	350	478	54 6
67	368	503	57 5
68	391	535	611
69	417	571	653
70	447	612	699
71	480	656	7 49
72	514	704	804
73	546	751	861
74	585	803	919
75	62 7	860	983
76	669	917	1049
77	714	978	1117
78	759	1039	1187
79	807	1105	1262
80	858		7202
81	911		
82	965		
83	1030		
84	1096		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A87 Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for extra \$10 of Home Care Daily Benefit

PREFERRED RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44	12	16	18
45-49	13	18	20
50-54	14	19	22
55-59	16	23	27
60-64	23	31	35
65	28	38	43
66	30	41	46
67	32	43	49
68	35	48	54
69	37	50	57
70	40	54	62
71	43	59	68
72	47	65	74
73	51	70	80
74	54	75	8 6
75	60	82	93
76	64	88	101
77	69	95	108
78	75	102	116
79	81	109	124
80	89		
81	95		
82	102		
83	110		
84	120		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	750 DAYS 17 20 22 29 37 41 44 46 48 53 56 61 67 70 77 82 87 94 100 107 115 122 130	24 27 30 40 50 56 59 63 66 72 77 84 91 97 105 112 120 129 137 146	UNLIMITED 27 30 34 45 56 64 67 72 76 82 89 96 103 111 119 128 137 147 157 167
83 84	139 150		

Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for extra \$10 of Home Care Daily Benefit

PREFERRED RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
	750 DAYS 22 24 28 33 41 46 48 52 54 59 62 67 72 76 83 87 93 100 106	30 33 37 46 57 64 67 71 75 81 85 92 98 105 113 120 129 137	UNLIMITED 34 38 42 53 65 73 77 81 86 92 98 105 112 120 129 138 148 157 167
80 81	113 121 128	156	179
82 83	128 136 145		
84	154		

CONTINENTAL CASUALTY COMPANY

Rate Sheet For P1-18876-A87 Long-Term Care Policy HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

STANDARD RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49	101 113	139 154	158
50-54	128	174	175 199
55-59	151	208	236
60-64	201	275	314
65	246	336	383
66	263	359	410
67	281	386	441
68	305	416	475
69	328	449	514
70	354	485	555
71	384	526	601
72	415	5 69	651
73	449	618	708
74	485	668	765
75	52 5	723	828
76	5 69	781	895
77	616	844	965
78	668	910	1038
79	721	981	1116
80	780		
81	841		
82	908		
83	986		
84	1065		

Long-Term Care Policy

HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES Annual Premium for first \$50 of Home Care Daily Benefit

STANDARD RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44	154	210	240
45-49	171	234	266
50-54	198	270	309
5 5 -59	253	346	395
60-64	323	440	503
65	366	503	574
66	385	528	603
67	409	559	639
68	435	596	683
69	469	641	733
70	505	691	78 9
71	545	745	851
72	586	803	916
73	62 6	861	986
74	674	926	1060
75	725	995	1139
76	780	1069	1221
77	835	1144	1308
78	893	1223	1396
79	955	1305	1489
80	1019		
81	1086		
82	1159		
83	1243		
84	1325		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for first \$50 of Home Care Daily Benefit

STANDARD RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE	MAXIMUM=	MAXIMUM=	MAXIMUM=
AGE	750 DAYS	1500 DAYS	UNLIMITED
18-44	191	261	298
45-49	213	290	331
50-54	243	333	380
55-59	299	409	468
60-64	368	505	578
65	418	570	651
66	438	598	683
67	460	629	719
68	48 9	669	764
69	521	714	816
70	559	765	874
71	600	820	936
72	643	880	1005
73	683	939	1076
74	731	1004	1149
75	784	1075	1229
76	8 36	1146	1311
77	8 93	1223	1396
78 79 80 81	949 1009 1073 1139	1299 1381	1484 1578
82 83 84	1206 1288 1370		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

STANDARD RATING GROUP

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79	750 DAYS 15 16 18 20 29 35 38 40 44 46 50 54 59 64 68 75 80 86 94 101 111		
81 82 83 84	119 128 138 150		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

STANDARD RATING GROUP WITH SIMPLE AUTOMATIC INCREASE RIDER R1-18880-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
82 83 84	163 174 188		

Long-Term Care Policy
HOME AND COMMUNITY-BASED CARE RIDER R1-18879-SERIES
Annual Premium for extra \$10 of Home Care Daily Benefit

STANDARD RATING GROUP WITH COMPOUND AUTOMATIC INCREASE RIDER R1-18881-SERIES

ISSUE AGE	MAXIMUM= 750 DAYS	MAXIMUM= 1500 DAYS	MAXIMUM= UNLIMITED
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	28 30 35 41 51 58 60 65 68 74 78 84 90 95 104 109 116 125 133 141 151 160 170	38 41 46 58 71 80 84 89 94 101 106 115 123 131 141 150 161 171 183 195	43 48 53 66 81 91 96 101 108 115 123 131 140 150 161 173 185 196 209 224
83 84	181 193		

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A87 Long-Term Care Policy

Health Rating Group Factors

Rates shown are for Preferred Rating Group and Standard Rating Group. Rates for Health Groups II and III are calculated by multiplying Standard rates by 1.20 and 1.40, respectively.

Elimination Period Factors

Rates shown are for 0 day elimination period. Rates for longer elimination periods are calculated by multiplying the 0 day rates by the appropriate factor from the following table:

Benefit <u>Maximum</u>	<u>30</u>	<u>60</u>	<u>90</u>	<u>180</u>	<u> 365</u>
1 year,2 year 4 year,6 year Lifetime	0.91	0.86	0.82	0.72	0.60 0.63 0.70

CONTINENTAL CASUALTY COMPANY Rate Sheet For P1-18876-A87 Long-Term Care Policy

FRANCHISE ASSOCIATION FACTORS

A. The rates will be multiplied by a factor of .90 if the following conditions are met:

For Associations of 200 lives or more:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. Minimum of 10 lives must be submitted.
- B. The rates will be multiplied by a factor of .95 if the following conditions are met:

For Associations of less than 200 lives:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. Minimum of 10 lives must be submitted.

SPOUSAL DISCOUNT

A 10% discount to the rates will be made if the following conditions are met:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. If both spouses apply for coverage simultaneously and are both issued, discount applies to both policies.

SERFF Tracking #: CNAB-133114867 State Tracking #: CNAB-133114867 Company Tracking #: PA-OP-GEN1-RA20-R1 (RATE ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Supporting Document Schedules

Bypassed - Item:	Transmittal Letter (A&H)
Bypass Reason:	Not required for this rate increase filing.
Attachment(s):	
Item Status:	
Status Date:	
	Actuarial Certification (A&H)
Comments:	The required Certification can be found in the Actuarial Memorandum.
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
	Please see attached.
Attachment(s):	20201231 - Actuarial Memorandum - OP Gen1 (LTC1 PC) - PA.pdf Exhibits 1a-4a (PA LTC1 Infl LT).pdf Exhibits 1b-4b (PA PC Infl LT).pdf 20201231 - Cover Letter - OP Gen1 (LTC1 PC) - PA.pdf
Item Status:	
Status Date:	
Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	There are no advertisements in this filing.
	There are no advertisements in this hilling.
Attachment(s): Item Status:	
Status Date:	
Bypassed - Item:	Authorization to File (A&H)
Bypass Reason:	The insurer is the filer.
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	This filing does not contain insert pages.
Attachment(s):	

SERFF Tracking #:	CNAB-133114867	State Tracking #:	CNAB-133114867		Company Tracking #:	PA-OP-GEN1-RA20-R1 (RATE ONLY)
State: FOI/Sub-TOI: Product Name: Project Name/Number:	PA-OP-GEN1-	dual Long Term Care/LTC03l.0 -RA20-R1 -RA20-R1 (RATE ONLY)/		iling Company:	Continental Casuali	ry Company
Item Status:						
Status Date:						
Bypassed - Item:		Rate Table (A&H)				
Bypass Reason:		No new forms are being	submitted.			
Attachment(s):			,			
Item Status:						
Status Date:						
Bypassed - Item:		Replacement Form with	Highlighted Chang	uoc (ΛΩ∐\		
Bypassed - item. Bypass Reason:		This is not a form filing.	nigniignied Chang	Jes (A&II)		
Attachment(s):		This is not a form ming.				
Item Status:						
Status Date:						
Bypassed - Item:		Advertisement Complian	nce Certification			
Bypass Reason:		There are no advertisen				
Attachment(s):		There are no advertisen	nonto in trilo ming.			
Item Status:						
Status Date:						
Bypassed - Item:		Reserve Calculation (A8				
Bypass Reason:		Not required for this rate	e increase filing.			
Attachment(s):						
Item Status:						
Status Date:						
Bypassed - Item:		Variability Explanation (A&H)			
Bypass Reason:		This is not a form filing.				
Attachment(s):						
Item Status:						
Status Date:						
Satisfied - Item:		Response to 2/26/2022	Note To Filer			
Comments:						
Attachment(s):		Exhibits 1a-4a (PA LTC Exhibits 1b-4b (PA PC I	1 Infl LT).xlsx nfl LT).xlsx			
Item Status:		,	,			

SERFF Tracking #: CNAB-133114867 State Tracking #: CNAB-133114867 Company Tracking #: PA-OP-GEN1-RA20-R1 (RATE ONLY)

Filing Company:

Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Pennsylvania

Product Name: PA-OP-GEN1-RA20-R1

State:

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Status Date:	
Satisfied - Item:	Response to 3/14/2022 Objection Letter
Comments:	
Attachment(s):	Response to Objection Letter (03.14.2022) - PA OP Gen1.pdf Item 1 – Exhibit 3a_Original Rate Level.xlsx Item 4 – Exhibit 3b_Original Rate Level.xlsx Item 7 - State Status Listing - OP Gen1 (as of 05.03.2022).xlsx Item 8 – Notification_ILTC_NoRI_NW_2021 11042021.pdf Item 8 – Notification_ILTC_RI_NW_2021 11042021.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Response to 7/13/2022 Objection Letter - Acceptance Letter
Comments:	
Attachment(s):	Response to Objection Letter (20220713) - PA OP Gen1 CNAB-133114867.pdf PA Seriatim Insured - GEN1 Final.xlsx PA Cost of Waiting Analysis - Both GEN1 & GEN2.pdf LTC1 - Infl LT - NW Equivalent LLR - 2 Year Increase.pdf
Item Status:	
Status Date:	

SERFF Tracking #: CNAB-133114867 State Tracking #: CNAB-133114867 Company Tracking #: PA-OP-GEN1-RA20-R1 (RATE ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Attachment Exhibits 1a-4a (PA LTC1 Infl LT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibits 1b-4b (PA PC Infl LT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 1 Exhibit 3a_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 4 Exhibit 3b_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 7 - State Status Listing - OP Gen1 (as of 05.03.2022).xlsx is not a PDF document and cannot be reproduced here.

Attachment PA Seriatim Insured - GEN1 Final.xlsx is not a PDF document and cannot be reproduced here.

Continental Casualty Company ("CCC") Actuarial Memorandum In Support of a Premium Rate Increase Request Pennsylvania

The following individual long term care policy forms subject to this rate increase request were originally issued nationwide from 1990 to 1999:

Product Portfolio	Issue Date Range	Policy Form
LTC 1	1990 to 1998	P1-15203-A37/-A87
Dromior/Clossic	1002 to 1000	P1-18215-A37/-A87
Premier/Classic	1993 to 1999	P1-18876-A37/-A87

1. Purpose and Justification of Filing

The purpose of this memorandum is to provide actuarial information supporting CCC's request for a rate increase for the above-listed policy forms. The rate increase request varies by benefit period and automatic increase benefit (AIB) rider as follows:

LTC1	Policies with AIB Rider	Policies without AIB Rider		
Unlimited Lifetime Max Benefits	34.5%	0.0%		
Non-Lifetime Max Benefits	0.0%	0.0%		

Premier/Classic	Policies with AIB Rider	Policies without AIB Rider			
Unlimited Lifetime Max Benefits	27.3%	0.0%			
Non-Lifetime Max Benefits	0.0%	0.0%			

Please see the Supplement to Rate Sheet for details on the implementation schedule.

This rate increase is requested in order to establish premium rates that are reasonable in relation to benefits based on actual historical experience and best-estimate projections for these forms. This rate filing is not intended to be used for other purposes.

Upon approval of this rate revision, CCC will communicate to insureds their options to reduce the impact of the rate increase. These options may include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit or eliminating optional riders.

Because the requested rate increase applies to policies with an AIB rider, insureds with an AIB rider who choose to drop it (i.e. Freeze and Drop) will:

- Not be subject to the AIB rate increase;
- Retain their inflated benefits as of the effective date of the coverage change; and
- Be charged an original issue age premium based on the original non-inflated benefits.

Available options will depend upon the insured's current coverage levels, benefit options available under their specific policy form, and any statutory minimum benefit levels in your state.

In addition, the Company is making a number of alternative options available for all insureds in conjunction with this rate increase. The first option provides an Increased Contingent Non-Forfeiture ("ICNF") benefit upon lapse. If this benefit is elected by the insured, the insured will not have to pay prospective premium, and their remaining benefit pool amount will equate to 150% of lifetime premiums paid, capped at current remaining lifetime benefits.

The second option that is being offered to insureds is the "Surrender Option". If this option is elected by the insured, the insured will surrender their policy in return for a one-time cash payment from the Company. The amount of the one-time cash surrender payment is equal to the unisex-adjusted statutory active life reserve held for the specific insured.

Both of the above alternative options will be offered to all insureds in your state (those with and without AIB riders), regardless of whether or not they receive a rate increase, in order to ensure fairness within the product portfolio. If a policy lapses due to non-payment of premiums without notifying the Company of the insured's intention to elect any of the above options, the insured's coverage will default to a standard 100% CNF benefit.

Please note:

- The requested rate increase amount is less than the amount CCC can justify; and
- CCC will continue to monitor the experience of this block and will react accordingly to experience development.

2. Description of Benefits

All of the forms are guaranteed renewable individual long term care policies sold through non-captive agents. Additional details for each product portfolio are shown below.

LTC 1 (P1-15203-Series, P1-16356-Series, P1-16928-Series, P1-16944-Series)

- P1-15203-Series pays for care in a long term care facility when either medically necessary or due to the inability to perform two or more activities of daily living or due to cognitive impairment. The policy does not require a prior hospitalization stay to qualify for benefits. The long term care daily benefit amount is paid for each day of eligible confinement during a period of care that occurs after the elimination period and during the benefit period. The benefit periods offered were one year (for ages 80-84), two years, four years, six years or unlimited. The policy does not have an aggregate lifetime maximum but benefit periods can fully restore subject to the conditions listed in the policy. The policy includes a waiver of premium benefit, a bed reservation benefit and an alternate plan of care benefit.
- Optional Benefits: Optional benefit riders offered: home health care rider and automatic increase
- P1-16356-Series is identical to P1-15203-Series except that it provides a return of premium benefit.
- P1-16928-Series is a state variation of P1-15203-Series but provides for nursing home only benefits and P1-16944-Series is identical to P1-16928-Series except that it provides a return of premium benefit.

Premier/Classic (P1-18215-Series, P1-18220-Series, P1-18876-Series, P1-18878-Series)

- P1-18215-Series and P1-18220-Series: These forms provide long term care and home health care benefits. Benefits are limited to the policy's lifetime maximum, which is equal to the following multipliers times the daily benefit amount: 365x (ages 80-84), 730x, 1,460x, or unlimited. Benefit eligibility requires inability to perform two or more activities of daily living or due to cognitive impairment.
- Long Term Care Benefits: This policy pays up to the long term care daily benefit amount, as shown on insured's policy schedule, for each day of long term care confinement limited to the benefit lifetime maximum.
- Home Health Care Benefits: Pays 100% of the expenses incurred each day for therapist or nurse, 80% of the expenses incurred for home health aide, medical social worker or homemaker and 80% of expenses incurred each day of care for adult day care or alternate care facility. The total benefits payable each day for home health care benefits is limited to the daily benefit amount shown on the insured's schedule (either 100% or 50% of the long term care daily benefit amount, selected at issue) and subject to the policy's benefit lifetime maximum.
- Other benefits: The policy includes a bed reservation, waiver of premium and an alternate plan of care benefit.

- Optional benefits: Automatic increase rider and benefit eligibility amendment rider.
- P1-18220-Series is identical to P1-18215-Series except that it provides a return of premium benefit.
- P1-18876-Series & P1-18878-Series: These forms provide long term care and home health care benefits with separate lifetime limits.
- Long Term Care Benefits: This policy pays the long term care daily benefit amount, as shown on the insured's policy schedule, for each day of long term care confinement limited to the benefit period selected. The insured could select two years, four years, six years, and unlimited for a benefit period if their issue age was 18-79 and one or two years if ages were 80-84. The policy includes a bed reservation benefit.
- Home Health Care Benefits: This policy has an optional home & community-based care benefit rider that pays 100% of the expenses incurred each day for therapist or nurse, 80% of the expenses incurred for home health aide, medical social worker or homemaker and 80% of expenses incurred each day of care for adult day care or alternate care facility. The total benefits payable each day for home health care benefits is limited to the daily home health care benefit amount shown on the insured's schedule, limited to the benefit period selected for the home health care rider. The benefit periods available were two years, five years, and unlimited for issue ages 18-79 and two years for issue ages 80-84.
- *Optional benefits*: Besides the home health care rider noted above, the policy offered optional automatic increase riders.
- *Optional benefits*: Besides the home health care rider noted above, the policy offered optional automatic increase riders.
- Policy P1-18878-Series is identical to P1-18876-Series except that it provides a return of premium benefit.

3. Renewability

These forms provide the insured guaranteed renewable individual long term care coverage.

4. Applicability of Rate Increase

This filing applies to in-force insureds only, as these forms are no longer being marketed. The premium change will apply to the base forms and all riders associated with the base forms for policies.

5. Experience Study and Actuarial Assumptions

This section provides a summary of the results of the annual experience study, along with the resulting assumptions utilized in the projection model. The liability assumptions below are consistent with the assumptions being used in the Company's reserve adequacy and asset adequacy testing. It is noted that some actual to expected ("A/E") analysis tables in this section have A/E ratios other than 100%. In order to reduce year over year volatility, if A/E results from the experience study are within an internal target range, the assumption will not be revised from the prior year's assumption.

Morbidity Overview

CNA has a sizeable block of LTC policies with a robust and credible amount of claims experience. As such, the 2020 morbidity study used experience from 2009 to 2019 to develop frequency and severity (claim utilization, disabled life mortality, and claim recovery) assumptions. CNA assesses morbidity experience separately for the Individual Long-Term Care (ILTC), State Farm (SF), and Group Long-Term Care (GLTC) blocks of business. Furthermore, any variation in assumption by different policyholder characteristics (i.e. gender) is based on company experience where meaningful variation has existed and is expected to continue in the future.

Assumptions are set at a granular level to provide the best possible fit to experience. A dynamic validation is then performed to ensure that assumptions provide a reasonable fit in the aggregate. The dynamic validation was performed by modeling best-estimate assumptions with inforce liability data as of December 31, 2018 to see how well the assumptions would replicate actual historical experience.

For policyholders aged 85 and older, CNA has approximately over 350K exposure years and over 35K claims. For older attained ages with less credible data, CNA has set incidence, claim recovery and utilization assumptions using age bands where assumptions do not vary beyond a certain age threshold. Disabled life mortality varies by attained age and is based on a 2012 IAM mortality table for attained ages 0 to 100 and based on the maximum of 2000 Annuity and 2012 IAM for attained ages 100 and older. Impairment factors by attained age are applied to this table to account for the higher mortality rates associated with disabled lives compared to healthy lives.

Morbidity experience can vary from carrier to carrier based on policy language, claim adjudication practices and rate increase programs undertaken. None of these differences are captured in industry studies. Given the fact that CNA has credible and robust claims experience, assumptions were set entirely based on company experience and were not directly compared to industry data.

The ILTC block is past its peak number of claims so the number of new incurred claims has been slowing. GLTC is a younger block and the number of new incurred claims is expected to continue to increase over the next twenty to thirty years. Also, within the study period mentioned above, CNA has implemented ILTC and GLTC rate increases on both ILTC and GLTC, which has temporarily increased incidence due to anti-selection.

The amount of new incurred claim dollars has increased over the recent past due to increases in the cost of care. Incurred claim dollars are expected to continue to increase for both ILTC and GLTC over the near to mid-term.

CNA has granular assumptions which allows for variation in lapse rates. One variation that is worth noting is the assumption that lapse rates are expected to be lower for policies with richer benefits (i.e. policies with longer benefit periods and with contractual inflation). Therefore, as the block ages, there is an expectation that the policies that persist will naturally have longer lengths of stay with higher severity as the mix shift changes over time. Also assumed in the claim utilization assumption is an expectation of rising cost of care inflation which will also lead to higher severity of claims over time.

Claim Incidence

The frequency of claim is the probability that a healthy insured will go into disabled status, also known as 'claim incidence'. The final incidence rate that gets modeled is comprised of a base incidence table, adjustment factors based on policy features and demographics, and adjustments for policyholder behavior to rate actions.

Base Incidence Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC base incidence rates, which includes experience over the past ten years. These tables show policy experience prior to any rate increases in order to avoid distortion caused by temporary anti-selection, which is layered on separately. This explains the shrinking exposure years over time. Something of note is the Individual Long-Term Care block has undergone significant rate action initiatives over the recent past, causing limited credibility that may not be representative of nationwide experience. This experience was factored into the assumption setting process but weighted according to the exposures shown below:

Best-Estimate Incidence A/E Results Individual Long Term Care								
Calendar Year	Exposures (Years)	Expected Incidence Rate	Actual / Expected					
2010	243,073	5,206	5,503	2.14%	2.26%	95%		
2011	233,060	5,325	5,750	2.28%	2.47%	93%		
2012	222,734	5,666	6,075	2.54%	2.73%	93%		
2013	212,130	6,017	6,196	2.84%	2.92%	97%		
2014	200,678	6,395	6,343	3.19%	3.16%	101%		
2015	189,684	6,923	6,396	3.65%	3.37%	108%		
2016	178,602	6,590	6,395	3.69%	3.58%	103%		
2017	168,277	6,858	6,509	4.08%	3.87%	105%		
2018	158,506	6,735	6,480	4.25%	4.09%	104%		

2019	150,028	6,522	6,617	4.35%	4.41%	99%
Total	1,956,772	62,237	62,264	3.18%	3.18%	100%

Base Incidence Assumption

The base incidence rates are single-dimensional tables that vary by attained age. These base incidence tables vary by the following:

- Whether the policy covers comprehensive or facility only benefits
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Gender

A sample table is shown below:

Plan Type: Comprehensive **Situs:** Assisted Living Facility

Gender: Male

Attained Age	Annual Incidence Rate (%)
44 and Prior	0.0009%
45	0.0011%
46	0.0013%
47	0.0015%
55	0.0057%
56	0.0067%
57	0.0079%
65	0.0295%
66	0.0348%
67	0.0410%
75	0.1655%
76	0.1976%
77	0.2358%
85	0.9667%
86	1.1525%
87	1.3738%%
88	0.9633%
89	1.6593%
90	1.8232%

91	1.4466%
92	2.1559%
95	2.7720%
96 to 120	3.0142%

Incidence Rate Adjustment Factors

There are a number of incidence rate adjustment factors that are applied to adjust the base incidence tables for various policy features. The annual experience study reviews these adjustment factors and provides updates as needed. The incidence adjustment factors are shown below:

Category	Variable/Benefit Feature	Adjustment Factor		
	Preferred	1.0000		
Underwriting Class	Standard	1.3082		
	Substandard	1.3622		
Elimination Period	0 Days	1.0000		
	1-89 Days	0.8068		
	90+ Days	0.8068		
Benefit Period	Lifetime	1.2418		
benefit Period	Non-Lifetime	1.0000		
Tax Status	Tax Qualified	0.8366		
	Non-Tax Qualified	1.0000		

Temporary Anti-Selection Overview

As part of the company's annual experience study, the relationship between premium rate actions and incidence rates were developed into an assumption set. At any time, there is a subset of policyholders that already qualify for their long term care benefits, but have not utilized the policy. When a rate increase notification is received, some of these policyholders will go on claim to avoid paying the increased premium, since their premium rates will be waived. This phenomenon is known as anti-selection or 'shock morbidity'. We are using a durational impact of 1 year and severity of 10% for ILTC. *Future Incidence Improvement (i.e. Morbidity Improvement)*

No future incidence improvement is assumed.

Model Calibration

The morbidity assumptions are intended to reflect the best-estimate of the long term. Long-Term Care policies are complex and have multiple decrements. Assumptions are developed independently and when combined in the model, they do not always produce results that seem reasonable. Model calibration is performed when necessary to fit the model to the long term view.

A dynamic validation was performed by modeling our best-estimate assumptions with inforce liability data as of December 31, 2018 to see how well the assumptions would replicate actual historical experience in the near term. This analysis was performed separately for ILTC and GLTC. Based on how well the model 'fits' actual claims experience, additional incidence calibration factors may be applied. A temporary ILTC calibration factor of 1.05 starting in 2019 and linearly grading down to 1.00 by 2025 was selected to recalibrate experience such that the model fits better in the near term.

Calendar Year	Calibration Factors
2018	1.0583
2019	1.0500
2020	1.0417
2021	1.0333
2022	1.0250
2023	1.0167
2024	1.0083
2025+	1.0000

Claim Severity

In the projection system, the severity of claim is the associated length and cost of a claim once an insured becomes disabled (or is already disabled). The severity of a claim is driven by three key assumptions:

- Claim Recovery
- Benefit Utilization
- Disabled Life Mortality

A further breakdown of these three components is described below.

Recovery Overview

Once a policyholder is on claim, there is an associated probability that the policyholder will recover back in to a 'healthy' status prior to death or exhausting benefits. This is the recovery rate assumption in the projection model.

Recovery Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC recovery rates, which includes experience over the past seven years:

Best-Estimate Recovery A/E Results Individual Long Term Care									
	Actuals			Current Claims			Future Claims		
Calendar Year	Exposures (Years)	Actual Recoveries	Actual Recovery Rate	Expected Recoveries	Expected Recovery Rate	Actual / Expected	Expected Recoveries	Expected Recovery Rate	Actual / Expected
2015	13,645	1,437	10.5%	1,496	11.0%	96%	1,483	10.9%	97%
2016	14,228	1,498	10.5%	1,489	10.5%	101%	1,473	10.4%	102%
2017	14,699	1,441	9.8%	1,451	9.9%	99%	1,445	9.8%	100%
2018	15,003	1,415	9.4%	1,426	9.5%	99%	1,431	9.5%	99%
2019	15,113	1,519	10.1%	1,415	9.4%	107%	1,398	9.3%	109%
Total	72,688	7,310	10.1%	7,277	10.0%	101%	7,230	9.9%	101%

Recovery Assumption

The recovery tables are two-dimensional that vary by age of disability and disability duration. The first five years of the tables contain monthly rates and are annual thereafter. The recovery tables vary by the following:

- Benefit period (lifetime vs non-lifetime)
- Gender
- Presence of a restoration of benefits rider
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Diagnosis of the claim (for insureds currently on claim)
- Tax-qualified status (tax-qualified, not tax-qualified)
- Eliminated period (0 day, 1-89 day, 90+ day)

Insureds that are currently in claim status have a known situs of care, so the recovery rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Policyholder Status: Healthy Benefit Period: Lifetime

Gender: Female

Restoration of Benefits: No

Situs: Nursing Home (original, since policy is healthy)

Tax-Qualified Status: Not tax-qualified **Elimination Period:** 1 to 89 days

Dischility Month	Disablement Age						
Disability Month	65	75	85	95			
1	3.35%	2.36%	1.65%	1.40%			
2	6.71%	4.71%	3.30%	2.80%			
3	4.96%	3.49%	2.44%	2.07%			
4	3.70%	2.60%	1.82%	1.54%			
5	2.86%	2.01%	1.40%	1.19%			
6	1.75%	1.23%	0.86%	0.73%			
7	1.15%	0.81%	0.56%	0.48%			
8	0.73%	0.51%	0.36%	0.30%			
9	0.52%	0.37%	0.26%	0.22%			
10	0.47%	0.33%	0.23%	0.20%			
11	0.43%	0.30%	0.21%	0.18%			
12	0.40%	0.28%	0.19%	0.17%			

Utilization Overview

The utilization assumption in the model for expense reimbursement policies represent the amounts, or severity, of paid claims and include components for cost of care, coverage available and the intensity of care ("health trend"). The available benefit is also considered by capping paid claims at the daily benefit amount.

Expense reimbursement refers to policies that are reimbursed up to the maximum daily benefit. They are considered separately from indemnity policies because indemnity policies pay the full maximum daily benefit. Expense reimbursement claim amounts are affected by cost of care inflation, intensity of care (referred to as "health trend"), and the amount of initial coverage purchased.

Health trends represent the intensity of care needed for claimants. Health trend is the ratio of inflation-adjusted paid claims divided by initial available benefits:

$$Health \, Trend = \frac{Paid \, Claim}{\frac{(1 + CostOf Care \, Inflation)^{(Experience \, Year - Issue \, Year)}}{Initial \, Available \, Benefits}$$

Indemnity policies have separate utilization assumptions from expense reimbursement policies because they pay their full available benefits and are not dependent on cost or intensity of care. Although indemnity policies pay the full maximum daily benefit, utilization rates are still below 100% because insureds are not in facilities 100% of the time. For example, if an insured is only in a facility 28 out of the 30 days in each month, then they would have a utilization rate equal to 28/30 = 93%. This is because benefit periods are based on service days and not strictly calendar days.

The utilization cost of care assumption is based on statutory valuation assumptions.

Utilization Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC utilization rates, which includes experience over the past seven years:

	Best-Estimate Utilization A/E Results – All Policies Individual Long Term Care											
			Current	Claims					Future	Claims		
Calend ar Year	Maximu m Available Benefit (\$million s)	Actual Paid Claims (\$million s)	Actual Utilizatio n Rate	Expected Paid Claims (\$million s)	Expecte d Utilizatio n Rate	Actual / Expecte d	Maximu m Available Benefit (\$million s)	Actual Paid Claims (\$million s)	Actual Utilizatio n Rate	Expected Paid Claims (\$million s)	Expecte d Utilizatio n Rate	Actual / Expecte d
2013	675	471	70%	461	68%	102%	675	471	70%	474	70%	99%
2014	748	518	69%	508	68%	102%	748	518	69%	523	70%	99%
2015	824	562	68%	552	67%	102%	824	652	68%	567	69%	99%
2016	909	623	69%	607	67%	103%	909	623	69%	623	69%	100%
2017	978	666	68%	649	66%	103%	978	666	68%	667	68%	100%
2018	1,052	707	67%	692	66%	102%	1,052	707	67%	712	68%	99%
2019	1,117	747	67%	732	66%	102%	1,117	747	67%	750	67%	100%
Total	6,302	4,294	68%	4,201	67%	102%	6,302	4,294	68%	4,316	68%	99%

Utilization Assumption

The health trend component of utilization tables are two-dimensional that vary by age of disability and disability duration. The first five years of the tables contain monthly rates and are annual thereafter. These tables vary by the following:

- Benefit Period (lifetime vs non-lifetime)
- Inflation type (simple, compound, none)
- Home health care percentage (0%, 1%-50%, 50%-75%, 75%+)
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Diagnosis of the claim (for insureds currently on claim)

In addition, the situs varies on whether the policyholder is healthy (original situs) versus disabled (current situs). A sample health trend table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Disabled
Benefit Period: Non-Lifetime
Inflation Type: Compound

Home Health Care Percentage: N/A (since situs is not home health care)

Situs: Assisted Living Facility (current, since policy is disabled)

Payment Type: Reimbursement

Diagnosis: Other

Dischility Month	Disablement Age						
Disability Month	65	75	85	95			
1	99%	91%	88%	90%			
2	60%	66%	72%	74%			
3	69%	75%	80%	85%			
4	63%	65%	72%	77%			
5	70%	72%	79%	82%			
6	71%	75%	79%	82%			
7	76%	76%	81%	85%			
8	76%	77%	82%	85%			
9	76%	77%	81%	83%			
10	79%	77%	82%	85%			
11	80%	80%	83%	86%			
12	79%	80%	83%	86%			

Cost of care tables are two-dimensional vectors that vary by calendar year and inflation type for reimbursement policies. The average cost of care is summarized below:

Cost of Care - ILTC					
Inflation Type	Historical Rate	Ultimate Rate			
None	0.12%	0.53%			
Simple	2.52%	2.93%			
Compound	3.97%	4.38%			

Disabled Life Mortality Overview

Once an insured is on claim, there is an associated probability that the insured will decrement due to death, which influences the overall length of a claim. Generally, the probability of death from a currently disabled insured is greater than the probability associated with a currently healthy insured, so separate assumptions are developed and modeled.

Disabled Life Mortality Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC disabled mortality rates, which includes experience over the past five years:

	Best-Estimate Disabled Mortality A/E Results Individual Long Term Care								
		Actuals		С	urrent Claim	ıs	F	uture Claim	S
Calendar Year	Exposures	Disabled Deaths	Disabled Mortality Rate	Expected Disabled Deaths	Expected Disabled Mortality Rate	Actual / Expected	Expected Disabled Deaths	Expected Disabled Mortality Rate	Actual / Expected
2015	13,645	4,172	30.6%	4,008	29.4%	104%	4,013	29.4%	104%
2016	14,228	4,183	29.4%	4,196	29.5%	100%	4,197	29.5%	100%
2017	14,699	4,376	29.8%	4,359	29.7	100%	4,363	29.7%	100%
2018	15,003	4,431	29.5%	4,460	29.7%	99%	4,478	29.8%	99%
2019	15,113	4,416	29.2%	4,531	30.0%	97%	4,544	30.0%	97%
Total	72,688	21,578	29.7%	21,554	29.7%	100%	21,595	29.7%	100%

Disabled Life Mortality Assumption

The disabled life mortality rates are two-dimensional tables that vary by age of disability and disability duration. Similar to the other severity assumptions, the first five years of the tables contain monthly rates and are annual thereafter. The disabled life mortality tables vary by the following:

- Benefit period (lifetime vs non-lifetime)
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Gender
- Diagnosis of the claim (for insureds currently on claim)

Insureds that are currently in claim status have a known situs of care, so the disabled life mortality rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Healthy
Benefit Period: Non-Lifetime

Situs: Nursing Home (original, since policy is healthy)

Gender: Male

Diagnosis: N/A (since status is healthy)

Disability Month		Disablement Age					
Disability Month	65	75	85	95			
1	2.14%	3.15%	3.58%	4.25%			
2	2.84%	4.17%	4.74%	5.62%			

3	3.07%	4.50%	5.11%	6.07%
4	3.46%	5.07%	5.76%	6.84%
5	3.07%	4.51%	5.12%	6.08%
6	2.68%	3.93%	4.47%	5.31%
7-12	2.10%	3.008%	3.50%	4.16%
13-18	1.80%	2.65%	3.05%	3.77%
19-24	1.82%	2.68%	3.08%	3.81%
25-36	2.07%	3.03%	3.53%	4.61%
37-48	2.23%	3.19%	3.76%	5.22%
49-60	2.47%	3.41%	4.06%	6.04%

Transitions of Situs

Following the annual claim reserve review, adjustments were made to the assumptions to account for transitions of situs. The result of these adjustments produced smoother claim development and a better fit in the dynamic validation. The following tables summarize these adjustments.

	Claim Closures (Recovery & Disabled Life Mortality)								
Product	Gender	Benefit Period	1-12	13-24	25-36	37-48	49-60	61-72	>72
	Female	Unlimited	1.00	1.00	1.00	1.00	1.00	1.00	1.00
ILTC	i ciliale	Limited	1.00	1.00	0.80	0.80	0.90	1.00	1.00
ILIO	Male	Unlimited	1.00	1.00	1.00	1.00	1.00	1.00	0.75
	iviale	Limited	1.00	1.00	0.80	0.80	0.90	1.00	0.75

	Utilization								
Product	Payment Type	Inflation Type	1-12	13-24	25-36	37-48	49-60	61-72	>72
	Exp. Inc.	С	1.20	1.20	1.20	1.20	1.20	1.20	1.20
		S	1.20	1.20	1.20	1.20	1.20	1.20	1.20
ILTC		N	1.20	1.20	1.20	1.20	1.20	1.20	1.20
ILIO		С	1.05	1.05	1.05	1.05	1.05	1.05	1.05
Indemnity	S	1.05	1.05	1.05	1.05	1.05	1.05	1.05	
		N	1.05	1.05	1.05	1.05	1.05	1.05	1.05

Persistency

In the projection system, the persistency assumptions relate to the probability that policyholders not on claim will lapse or die. Policyholder reduced benefit options are considered part of the persistency assumption and are modeled as partial lapses in the projection system. The persistency of an insured is driven by following key assumptions:

- Voluntary Lapse
- Shock Lapse and Reduced Benefit Option ("RBO")
- Shock Mortality
- Healthy Life Mortality
- Healthy Life Mortality Improvement

A further breakdown of these components is described below.

Voluntary Lapse Overview

The voluntary lapse assumption reflects the probability associated with an insured voluntarily canceling their policy. The voluntary lapse rates differ from shock lapse rates in that the policy cancelation is not due to a rate increase notification.

Voluntary Lapse Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC voluntary lapse rates, which includes experience over the past seven years:

	Best-Estimate Base Voluntary Lapse A/E Results Individual Long Term Care					
Calendar Year	Exposures (Years)	Actual Lapse	Expected Lapse	Actual Lapse Rate	Expected Lapse Rate	Actual / Expected
2013	206,775	1,879	1,678	0.91%	0.75%	112%
2014	193,954	1,703	1,458	0.88%	0.70%	117%
2015	182,172	1,403	1,283	0.77%	0.67%	109%
2016	170,825	1,250	1,145	0.73%	0.65%	109%
2017	160,433	1,045	1,039	0.65%	0.64%	101%
2018	150,258	1,059	965	0.71%	0.65%	110%
2019	140,168	857	906	0.61%	0.65%	95%
Total	1,246,574	9,197	8,474	0.76%	0.70%	109%

Voluntary Lapse Assumption

The voluntary lapse tables are one-dimensional varying by policy duration. The voluntary lapse assumptions vary by the following:

- Benefit Period (lifetime vs non-lifetime)
- Inflation Type (simple, compound, none)
- Product

Limited Pay Adjustment

A sample voluntary lapse table is shown below:

Product: ILTC

Benefit Period: Lifetime **Inflation Type:** None

Policy Duration	Base Voluntary Lapse Rate
1	7.45%
2	4.45%
3	3.45%
4	2.95%
5	2.55%
6	2.20%
7	1.90%
8	1.65%
9	1.45%
10	1.25%
11	1.05%
12	0.95%
13	0.90%
14	0.85%
15	0.80%
16+	0.75%

Shock Lapse and Reduced Benefit Option

The shock lapse and RBO assumptions are modeled as an increase in lapse rates in response to a rate increase. Shock lapse and RBO assumptions are determined by calculating the lapse rates in excess of base lapse rates during the years when a premium rate action occurs.

The assumed rates for each of these components are outlined in the below table for the ILTC product:

Rate Increase	Total Additional Lapse % from Shock and RBO*
0%	0.00%
5%	0.47%
10%	1.18%
15%	1.87%

20%	2.56%
25%	3.24%
30%	3.90%
35%	4.56%
40%	5.21%
45%	5.84%
50%	6.47%
55%	7.09%
60%	7.69%
65%	8.29%
70%	8.88%
75%	9.46%
80%	10.02%
85%	10.37%
90%	10.72%
95%	11.07%
100%	11.42%
90% 95%	10.72% 11.07%

Healthy Life Mortality Overview

The healthy life mortality assumption is the probability of death associated with currently healthy insureds.

Healthy Life Mortality Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC healthy life mortality rates, which includes experience from 2013 to 2019:

Best-Estimate Healthy Life Mortality A/E Results Individual Long Term Care						
Calendar Year	Exposures (Years)	Actual Death	Expected Death	Actual Death Rate	Expected Death Rate	Actual / Expected
2013	207,435	4,559	4,751	2.20%	2.29%	96%
2014	197,707	4,787	4,663	2.46%	2.39%	103%
2015	182,998	4,194	4,102	2.29%	2.24%	102%
2016	171,680	3,918	3,990	2.28%	2.32%	98%
2017	161,263	3,558	3,680	2.21%	2.28%	97%
2018	151,054	3,700	3,369	2.45%	2.23%	110%
2019	140,904	3,165	3,070	2.25%	2.18%	103%
Total	1,210,040	27,881	27,624	2.30%	2.28%	101%

Healthy Life Mortality Assumption

The base table for the healthy life mortality assumption is the 2012 IAM table, with additional multipliers based on company experience. There are also adjustments at higher attained ages, due to lack of credibility. At higher ages, the assumptions grade their credibility weighting from 100% of the best-estimate assumption at age 95, to 100% of the 2012 IAM tables at ages 105 and later. These base tables vary by gender and attained age. The additional multipliers to these base tables based on CCC's experience are as follows:

Category	Variable/Benefit Feature	Adjustment Factors
	0-59	68%
	60-64	61%
	65-69	60%
Attained Age	70-74	114%
Attained Age	75-79	107%
	80-84	93%
	85-89	83%
	90-94	91%
Gender	Male	100%
Gender	Female	90%
	Preferred	85%
Underwriting Class	Standard	131%
0.000	Substandard	160%
	2014 and Prior	1.00
	2015	0.90
	2016	0.90
	2017	0.85
	2018	0.80
Calendar Year	2019	0.75
Calendar Year	2020	0.70
	2021	0.70
	2022	0.70
	2023	0.75
	2024	0.80
	2025	0.85

2026	0.90
2027	0.95
2028+	1.00

Healthy Life Mortality Improvement

A healthy life mortality improvement factor is applied to the base healthy mortality table to reflect studies that examine the improvement of population mortality over time, based on improvement scale G2. The healthy life mortality improvement varies by gender and attained age with improvement beginning 1/1/2017 for 10 years. An example is shown below for reference:

Gender: Female

Attained Age	Annualized Improvement
<=50	1.00%
50	1.00%
60	1.30%
70	1.30%
80	1.30%
90	0.60%
100	0.20%
105	0.00%

6. Discount Rate

The inforce count-weighted average maximum statutory valuation interest rate for contract reserves is used to accumulate past actual experience and discount future expectations. The rate varies by product as follows:

Product Portfolio	Interest Rate
LTC1	5.17%
Premier/Classic	4.64%

7. Expenses

This filing is based on loss ratios and expense levels have not been considered. Commissions are not paid on rate increase premiums.

8. Marketing Method

These policies were sold directly through non-captive agents.

9. Underwriting Description

These policy forms were fully underwritten with the use of various tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interviews, and/or face-to-face assessments.

10. Premiums

Premiums are unisex and payable for life unless the insured selected a limited pay option. The premiums may vary by issue age, elimination period, benefit period / lifetime maximum, initial daily benefit amount, level of home health care coverage, inflation type, premium mode, underwriting class, marital status, and the selection of any other options or riders.

11. Modal Premium Factors

The following modal factors remain unchanged and are applied to the annual premium to obtain the modal premium.

Payment Mode	Modal Factor	Nationwide Premium Distribution at Dec. 31, 2020
Annual	1.000	61.2%
Semi-Annual	0.520	8.3%
Quarterly	0.270	12.0%
Monthly	0.090	18.6%

12. Issue Age Range

Issue ages range from 18 to 84.

13. Area Factors

Area factors are not used for these policy forms.

14. Average Annualized Premium

The average annualized premium for the policy forms subject to the rate increase request, both before and after the impact of the requested rate increase, is included in Exhibit 1.

15. Number of Insureds

The current number of insureds as of December 31, 2020 can be found in Exhibit 1.

16. Distribution of Business

The historical experience reflects the actual distribution of insureds during the experience period. The current distribution of business as of December 31, 2020 was used to project future experience. Exhibit 2 contains the distribution of the inforce insureds by key demographic and benefit characteristics.

17. Claim Liability and Reserves

Active life reserves have not been used in this rate increase analysis. Claim reserves as of December 31, 2020 have been discounted to the incurral date of each respective claim and included in historical incurred claims. Incurred but not reported reserve ("IBNR") balances and terminated but not reported reserve ("TBNR") balances as of December 31, 2020 have been allocated to a calendar year of incurral and included in historical incurred claims.

18. Trend Assumptions

As this is not medical insurance, explicit medical cost trends have not been included in the projections.

19. Experience – Past and Future

Earned premiums and incurred claims, projected through 2079 are developed from a first-principles actuarial model representing actual contracts in-force as of December 31, 2020. The assumptions described in Section 5 are used to project earned premiums and incurred claims.

Waived premiums are not included as premiums nor claims in either the actual historical or the projected future experience.

Historical results reflect earned premium by calendar year with claims captured by incurral year. That is, incurred claims for a calendar year represent all payments through December 31, 2020 for a claim incurred in a particular calendar year plus any claim reserve held as of December 31, 2020. Incurred claims also include IBNR and TBNR held as of December 31, 2020.

Exhibit 3 presents nationwide experience as described in Section 21 for all forms affected by this rate increase to ensure maximum credibility. Although we believe the State-specific data is not credible on its own, we are including State-specific experience through December 31, 2020 for reference in Exhibit 4.

Annual loss ratios are calculated, with and without interest, as incurred claims divided by earned premiums.

A lifetime loss ratio as of December 31, 2020 is calculated as the sum of accumulated past experience and discounted future expectations using the nationwide inforce count-weighted average maximum statutory valuation interest rate for contract reserves.

20. History of Rate Adjustments

See Exhibit 1 for a history of prior rate adjustments in your state.

21. Ensuring No Cross-Subsidization Between States

We have ensured no state's rate increase approvals will subsidize other states' experience. Rate increase requests will vary by state, but only to reflect the timing and amount of prior rate increases approved by that state. This is accomplished by first backing-out all prior rate increases from our nationwide premium data. We then reintroduce prior rate increases with the amount and timing based on your state's prior approvals (as referenced in Section 19). The current proposed rate increase(s) are then determined.

Although some states may have capped our previous inforce rate increase filings, it is the intention of CCC's management that subsequent filings will be submitted at a later date until an actuarially equivalent amount is achieved.

22. Requested Rate Increase and Demonstration of Satisfaction of Requirements

CCC is requesting a rate increase on the policy forms included in this filing, to be implemented over one year. The rate increase varies by benefit period and AIB rider as follows:

LTC1	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	34.5%	0.0%
Non-Lifetime Max Benefits	0.0%	0.0%

Premier/Classic	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	27.3%	0.0%
Non-Lifetime Max Benefits	0.0%	0.0%

Please see the Supplement to Rate Sheet for details on the implementation schedule.

Corresponding rate schedules reflecting the increase are included with this filing. Although this request is less than CCC can justify, we are limiting our rate increase request at this time. CCC will continue to monitor the experience of this block and take appropriate actions when necessary.

Upon approval of this rate revision, CCC will communicate to insureds their options to reduce the impact of the rate increase. These options may include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit or eliminating optional riders. Because the requested rate increase applies to policies with an AIB rider, insureds with an AIB rider who choose to drop it (i.e. Freeze and Drop) will:

- Not be subject to the AIB rate increase;
- Retain their inflated benefits as of the effective date of the coverage change; and
- Be charged an original issue age premium based on the original non-inflated benefits.

Available options will depend upon the insured's current coverage levels, benefit options available under their specific policy form, and any statutory minimum benefit levels in your state.

In addition, the Company is making a number of alternative options available for all insureds in conjunction with this rate increase. The first option provides an Increased Contingent Non-Forfeiture ("ICNF") benefit upon lapse. If this benefit is elected by the insured, the insured will not have to pay prospective premium, and their remaining benefit pool amount will equate to 150% of lifetime premiums paid, capped at current remaining lifetime benefits.

The second option that is being offered to insureds is the "Surrender Option". If this option is elected by the insured, the insured will surrender their policy in return for a one-time cash payment from the Company. The amount of the one-time cash surrender payment is equal to the unisex-adjusted statutory active life reserve held for the specific insured.

Both of the above alternative options will be offered to all insureds in your state, regardless of whether or not they receive a rate increase, in order to ensure fairness within the product portfolio. If a policy lapses due to non-payment of premiums without notifying the Company of the insured's intention to elect any of the above options, the insured's coverage will default to a standard 100% CNF benefit.

Note that the actual rates implemented may vary slightly from those filed due to implementation rounding algorithms.

Satisfaction of minimum required loss ratio requirements is demonstrated in Exhibit 1. This approach shows that with the requested rate increase, the expected lifetime loss ratio exceeds the minimum loss ratio requirement.

23. Proposed Effective Date

The rate increase will apply to policies on their next anniversary date following a notification period at least as long as required by your state following approval. No insured will receive more than one increase in a 12 month period.

24. Actuarial Certification

I am an Associate of the Society of Actuaries and a Member of the American Academy of Actuaries. I meet the Academy's qualification standards to render this actuarial opinion and am familiar with the filing requirements for long term care insurance premium and rate increases.

This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice ("ASOP"), including, but not limited to, the following:

- ASOP 7, "Analysis of Life, Health, or Property/Casualty Insurer Cash Flows";
- ASOP 8, "Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits";
- ASOP 18, "Long Term Care Insurance";
- ASOP 23, "Data Quality"; and
- ASOP 41, "Actuarial Communications".

I have relied upon policy and claim information extracts, as of December 31, 2020, which contain a seriatim listing of all insureds covered under CCC Long Term Care insurance contracts. I have also relied upon associated paid premium extracts providing details of payment dates and amounts. I have also relied upon associated paid claim extracts providing details by claim regarding payment dates, service dates, benefit types and payment amounts. This information was provided by CCC's Long Term Care Operations team in partnership with our Third Party Administrator.

I have relied upon statutory reserves as of December 31, 2020, for Claims Reserves, Incurred but Not Reported reserves, and Terminated but Not Reported Reserves, provided by CCC's Long Term Care Finance and Reserving team.

I have relied upon actuarial assumptions developed by CCC's Long Term Care Projections and Experience Studies team, which develops assumptions primarily for asset and reserve adequacy analysis, under the direction of the opining actuary, John Munro, FSA, MAAA, who approved those assumptions in collaboration with other CCC Long Term Care actuaries, including Inforce Management actuaries. These assumptions present the actuary's best judgement, as of December 31, 2020. We have reviewed these assumptions for reasonableness and consistency for use in this filing.

I hereby certify that, to the best of my knowledge and judgement, this rate filing is in compliance with the applicable laws and regulations of your state. In my opinion, the actuarial assumptions are appropriate and the rates are neither excessive nor unfairly discriminatory.

Louis Scarim, ASA, MAAA

lou San

Actuarial Consulting Director, LTC Inforce Management (312) 822-6179

louis.scarim@cna.com

January 16, 2022

Date

25. Exhibit Listing

• Exhibit 1: State-Specific Information

• Exhibit 2: Distribution of Inforce Insureds

• Exhibit 3: Nationwide Experience and Projections

Exhibit 4: State-Specific Experience and Projections

Exhibit 1a

Continental Casualty Company
LTC1 - Policy Forms with Lifetime Benefits & Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide
Without Increase	\$2,116
With Increase	\$2,846

Pennsylvania	
\$2,257	
\$3,034	

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide
Insureds Not on Claim	3,780
Insureds on Claim	689
Total Insureds	4,469
2020 Annualized Premium	\$9,456,911

Pennsylvania
307
47
354
\$798,813

Insureds Not Eligible for Rate Increase

	Nationwide
Non-Forfeiture Insureds Not on Claim	107
Non-Forfeiture Insureds on Claim	1
Paid-Up Limited Pay Insureds Not on Claim	0
Paid-Up Limited Pay Insureds on Claim	0
Total Non-Forfeiture and Paid-Up Insureds	108

Pennsylvania
18
0
0
0
18

18) History of Rate Adjustments

SERFF Number	Approval Date
N/A	6/28/2002
N/A	7/10/2003
CNAB-127154621	9/2/2011
CNAB-130150831	3/23/2016
CNAB-131276497	4/3/2018
CNAB-132346264	8/22/2020

Rate Increase Approved						
15.0%						
40.0%						
25.0%*						
20.0%						
20.0%**						
5.0%						

Implemented over a two-year period (11.8%, 11.8%)*
Implemented over a two-year period (9.54%, 9.54%)**

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	180%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

1/16/2022 Inforce Exhibit

Exhibit 2a Continental Casualty Company LTC1 - Policy Forms with Lifetime Benefits & Standard Inflation Distribution of Inforce Insureds Eligible for Rate Increase Pennsylvania

			N	ationwide			Pe	nnsylvania	
		Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
	1987	0	0%	\$0	0%	0	0%	\$0	0%
	1988	0	0%	\$0	0%	0	0%	\$0	0%
	1989	0	0%	\$0	0%	0	0%	\$0	0%
	1990	0	0%	\$0	0%	0	0%	\$0	0%
			-						
	1991	292	7%	\$635,413	7%	0	0%	\$0	0%
	1992	1,489	33%	\$3,136,622	33%	98	28%	\$227,935	29%
	1993	1,754	39%	\$3,670,574	39%	216	61%	\$492,877	62%
	1994	757	17%	\$1,600,099	17%	40	11%	\$78,001	10%
	1995	176	4%	\$413,376	4%	0	0%	\$0	0%
	1996	1	0%	\$827	0%	0	0%	\$0	0%
	1997	0	0%	\$0	0%	0	0%	\$0	0%
	1998	ō	0%	\$0	0%	0	0%	\$0	0%
	1999	o o	0%	\$0	0%	0	0%	\$0	0%
	2000	0				0			-
			0%	\$0	0%		0%	\$0	0%
a	2001	0	0%	\$0	0%	0	0%	\$0	0%
Issue Year	2002	0	0%	\$0	0%	0	0%	\$0	0%
ē	2003	0	0%	\$0	0%	0	0%	\$0	0%
ารู	2004	0	0%	\$0	0%	0	0%	\$0	0%
<u>•</u>	2005	0	0%	\$0	0%	0	0%	\$0	0%
	2006	0	0%	\$0	0%	0	0%	\$0	0%
	2007	Ö	0%	\$0	0%	0	0%	\$0	0%
	2007	0	0%	\$0	0%	0	0%	\$0	0%
		0							
	2009		0%	\$0	0%	0	0%	\$0	0%
	2010	0	0%	\$0	0%	0	0%	\$0	0%
	2011	0	0%	\$0	0%	0	0%	\$0	0%
	2012	0	0%	\$0	0%	0	0%	\$0	0%
	2013	0	0%	\$0	0%	0	0%	\$0	0%
	2014	0	0%	\$0	0%	0	0%	\$0	0%
	2015	o o	0%	\$0	0%	0	0%	\$0	0%
	2016	0	0%	\$0	0%	0	0%	\$0	0%
									_
	2017	0	0%	\$0	0%	0	0%	\$0	0%
	2018	0	0%	\$0	0%	0	0%	\$0	0%
	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
	<35		0%	¢4.207	0%	- 4	0%	£4.460	0%
		3	-	\$4,307		1		\$1,168	
	35-39	7	0%	\$6,003	0%	2	1%	\$1,293	0%
	40-44	45	1%	\$59,746	1%	10	3%	\$10,029	1%
	45-49	839	19%	\$1,132,440	12%	69	19%	\$101,984	13%
ge	50-54	1,362	30%	\$2,103,886	22%	123	35%	\$201,993	25%
lssue Age	55-59	1,307	29%	\$2,944,292	31%	97	27%	\$244,494	31%
en	60-64	721	16%	\$2,364,993	25%	42	12%	\$175,985	22%
ss	65-69	174	4%	\$773,540	8%	10	3%	\$61,866	8%
	70-74	10	0%	\$53,758	1%	0	0%	\$0	0%
	75-79	1	0%	\$13,945	0%	0	0%	\$0	0%
	80+	6	0%	\$13,943	0%	0	0%	\$0	0%
	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
	1 Otal	4,403	100 /6	\$9,430,311	100 /6	334	100 /6	\$750,013	100 /6
	<45	0	0%	\$0	0%	0	0%	\$0	0%
	45-49	0	0%	\$0	0%	0	0%	\$0	0%
	50-54	1	0%	\$1,168	0%	1	0%	\$1,168	0%
	55-59	1	0%	\$691	0%	0	0%	\$0	0%
Age	60-64	4	0%	\$4,922	0%	2	1%	\$1,293	0%
₹	65-69	24	1%	\$31,405	0%	2	1%	\$2,035	0%
рәц			-						
air	70-74	389	9%	\$546,858	6%	38	11%	\$47,819	6%
Attaiı	75-79	1,086	24%	\$1,580,855	17%	87	25%	\$139,054	17%
	80-84	1,339	30%	\$2,468,882	26%	111	31%	\$218,392	27%
	85-89	1,080	24%	\$2,779,646	29%	85	24%	\$245,324	31%
	90+	545	12%	\$2,042,484	22%	28	8%	\$143,729	18%
	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
	lv.		0=2/		-				
Gender	Male	1,654	37%	\$3,688,128	39%	131	37%	\$326,034	41%
e e	Female	2,815	63%	\$5,768,783	61%	223	63%	\$472,779	59%
Ŋ	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
	None	0	0%	\$0	0%	0	0%	\$0	0%
Inflation Type	Simple	1,086	24%	\$2,457,972	26%	67	19%	\$181,105	23%
flat yp	Compound	3,383	76%	\$6,998,939	74%	287	81%	\$617,708	77%
<u> </u>	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
	10.01	1 -7,700	100/0	¥5,455,311	100 /0	I	100/0	ψ130,013	100/6
2	TQ	0	0%	\$0	0%	0	0%	\$0	0%
atc ax	NTQ	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
Tax Status	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
Max Benefit	Lifetime	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
Ma	Not Lifetime	0	0%	\$0	0%	0	0%	\$0	0%
ä	Total	4,469	100%	\$9,456,911	100%	354	100%	\$798,813	100%
	E1124 . O . !	1 400	L 60/	0474.500	00/		L 60'	20	1 001
Cov	Facility Only Comprehensive	108 4,361	2% 98%	\$174,500 \$9,282,411	2% 98%	0 354	0% 100%	\$0 \$798,813	0% 100%
ے ن	Total	4,361		\$9,456,911		354		\$798,813	100%
	i Ulai	4,409	100%	φ σ,4 50,911	100%	354	100%	↓ ⊅0,013	100%

1/16/2022 Inforce Distribution

Exhibit 3a

Continental Casualty Company

LTC1 - Policy Forms with Lifetime Benefits & Standard Inflation

Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

		Without Rate	e Increase		With 34.5% Cumulative Rate Increase					
Year	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Lo Ratio		
	<u> </u>			Historical						
1988	-	-	0%	0%	-	-	0%	0%		
1989 1990			0% 0%	0% 0%			0% 0%	0% 0%		
1991	302,590		0%	0%	302,590		0%	0%		
1992	3,587,588	9,289	0%	0%	3,587,588	9,289	0%	0%		
1993	9,470,851	403,881	4%	3%	9,470,851	403,881	4%	3%		
1994	13,338,015	3,599,530	27%	15%	13,338,015	3,599,530	27%	15%		
1995 1996	14,466,745 13,720,183	3,572,475 4,046,018	25% 29%	18% 21%	14,466,745 13,720,183	3,572,475 4,046,018	25% 29%	18% 21%		
1997	13,666,230	5,673,528	42%	25%	13,666,230	5,673,528	42%	25%		
1998	13,273,852	5,042,742	38%	27%	13,273,852	5,042,742	38%	27%		
1999	12,840,362	8,997,945	70%	33%	12,840,362	8,997,945	70%	33%		
2000	12,579,372	7,017,031	56%	36%	12,579,372	7,017,031 7,887,398	56%	36%		
2001 2002	12,260,405 12,687,782	7,887,398 10,621,595	64% 84%	39% 43%	12,260,405 12,687,782	10,621,595	64% 84%	39% 43%		
2003	14,661,342	15,544,213	106%	49%	14,661,342	15,544,213	106%	49%		
2004	19,667,634	14,107,506	72%	52%	19,667,634	14,107,506	72%	52%		
2005	19,345,044	12,226,292	63%	53%	19,345,044	12,226,292	63%	53%		
2006 2007	17,766,441 17,217,814	20,940,736 21,838,481	118% 127%	59% 64%	17,766,441 17,217,814	20,940,736 21,838,481	118% 127%	59% 64%		
2007	16,538,509	22,219,486	134%	69%	16,538,509	22,219,486	134%	69%		
2009	15,853,396	29,750,882	188%	76%	15,853,396	29,750,882	188%	76%		
2010	15,005,323	25,440,540	170%	82%	15,005,323	25,440,540	170%	82%		
2011	14,377,340	32,584,669	227%	89%	14,377,340	32,584,669	227%	89%		
2012	14,955,795	37,022,161	248%	97%	14,955,795	37,022,161	248%	97%		
2013 2014	15,526,244 14,743,896	42,691,034 43,036,119	275% 292%	106% 114%	15,526,244 14,743,896	42,691,034 43,036,119	275% 292%	106% 114%		
2014	13,680,020	43,036,119	292% 347%	123%	13,680,020	47,484,123	292% 347%	123%		
2016	13,495,170	51,310,024	380%	133%	13,495,170	51,310,024	380%	133%		
2017	14,007,361	57,978,997	414%	144%	14,007,361	57,978,997	414%	144%		
2018	13,063,132	63,940,742	489%	156%	13,063,132	63,940,742	489%	156%		
2019	13,259,356	60,056,962	453%	166%	13,259,356	60,056,962	453%	166%		
2020 Total Actual	12,755,846 408,113,640	51,364,438 706,408,837	403% 173%	173% 173%	12,755,846 408,113,640	51,364,438 706,408,837	403% 173%	173% 173%		
otal Actual	408,113,640	706,408,837	1/3%	1/3%	408,113,640	706,408,837	173%	1/3%		
				Projected						
2021	11,329,174	56,969,939	503%	182%	12,002,974	56,465,185	470%	182%		
2022 2023	10,363,674 9,377,562	64,956,477 61,009,031	627% 651%	193% 202%	13,037,661 12,051,636	65,484,996 61,221,647	502% 508%	191% 200%		
2023	8,419,243	62,469,964	742%	213%	10,820,046	59,702,544	552%	208%		
2025	7,495,453	63,246,341	844%	223%	9,632,830	60,444,528	627%	217%		
2026	6,614,731	63,400,407	958%	234%	8,500,966	60,591,769	713%	226%		
2027	5,783,791	62,925,841	1088%	244%	7,433,077	60,138,226	809%	235%		
2028	5,006,716	61,648,213	1231%	255%	6,434,414	58,917,197	916%	244%		
2029	4,288,571	59,665,074	1391%	265%	5,511,485	57,021,911	1035%	253%		
2030 2031	3,642,012 3,067,876	57,032,474 53,782,831	1566% 1753%	275% 284%	4,680,555 3,942,701	54,505,935 51,400,252	1165% 1304%	261% 269%		
2032	2,562,287	49,966,237	1950%	293%	3,292,940	47,752,733	1450%	277%		
2033	2,121,095	45,788,357	2159%	301%	2,725,939	43,759,933	1605%	284%		
2034	1,739,329	41,331,300	2376%	308%	2,235,310	39,500,324	1767%	291%		
2035	1,411,700	36,559,279	2590%	315%	1,814,256	34,939,703	1926%	296%		
2036 2037	1,133,458 899,489	31,664,268 26,904,576	2794% 2991%	321% 325%	1,456,672 1,155,985	30,261,541 25,712,703	2077% 2224%	301% 306%		
2037	705,172	22,442,133	3183%	330%	906,256	21,447,946	2367%	309%		
2039	545,576	18,355,792	3364%	333%	701,151	17,542,631	2502%	312%		
2040	416,162	14,681,669	3528%	336%	534,833	14,031,271	2623%	315%		
2041	312,736	11,475,216	3669%	338%	401,915	10,966,864	2729%	317%		
2042	231,252	8,784,647	3799%	339%	297,195	8,395,487	2825%	318%		
2043 2044	168,073 120,000	6,567,672 4,778,264	3908% 3982%	341% 341%	216,000 154,219	6,276,724 4.566.587	2906% 2961%	319% 320%		
2045	84,121	3,396,980	4038%	342%	108,108	3,246,494	3003%	320%		
2046	57,913	2,382,094	4113%	342%	74,427	2,276,567	3059%	321%		
2047	39,207	1,666,594	4251%	343%	50,388	1,592,764	3161%	321%		
2048	26,167	1,171,784	4478%	343%	33,629	1,119,874	3330%	321%		
2049	17,288	827,684	4788%	343%	22,218	791,017	3560%	322%		
2050 2051	11,372 7,501	592,803 434,610	5213% 5794%	343% 343%	14,614 9,640	566,542 415,357	3877% 4309%	322% 322%		
2051	5,002	323,529	6469%	343%	6,428	309,196	4810%	322%		
2053	3,398	245,409	7221%	343%	4,367	234,538	5370%	322%		
2054	2,362	192,302	8140%	343%	3,036	183,783	6053%	322%		
2055	1,686	155,479	9224%	344%	2,166	148,591	6859%	322%		
2056	1,232	129,980	10549%	344% 344%	1,583	124,222	7845% 8792%	322%		
2057 2058	917 693	108,409 89,741	11823% 12956%	344% 344%	1,178 890	103,607 85,765	8792% 9635%	322% 322%		
2059	529	76,757	14510%	344%	680	73,356	10790%	322%		
2060	404	65,782	16282%	344%	519	62,868	12108%	322%		
2061	309	55,902	18100%	344%	397	53,425	13460%	322%		
2062	235	47,528	20218%	344%	302	45,423	15035%	322%		
2063 2064	177 133	39,960 32,532	22521%	344% 344%	228 171	38,190 31,091	16747%	322% 322%		
2065	97	32,532 25,030	24474% 25689%	344%	125	31,091 23,921	18200% 19104%	322% 322%		
2066	70	17,432	25079%	344%	89	16,660	18650%	322%		
2067	48	11,322	23454%	344%	62	10,821	17441%	322%		
2068	33	7,149	21966%	344%	42	6,833	16335%	322%		
2069	21	4,366	20617%	344%	27	4,172	15332%	322%		
2070	13	2,583	19438%	344%	17	2,468	14455%	322%		
2071 2072	8 5	1,486 828	18518% 17859%	344% 344%	10 6	1,420 791	13771% 13281%	322% 322%		
2072	3	828 446	17859%	344%	3	427	12901%	322%		
2074	1	232	17040%	344%	2	222	12672%	322%		
2075	1	114	16458%	344%	1	109	12239%	322%		
2076	0	51	15008%	344%	0	49	11161%	322%		
2077	0	21	13216%	344%	0	20	9828%	322%		
2078 2079	0	8 2	11537% 9962%	344% 344%	0	7 2	8579% 7408%	322% 322%		
tal Projected	88,016,077	998,512,932	1134%	1134%	110,276,370	962,619,230	873%	873%		
otal Lifetime										
	496,129,717	1,704,921,768	344%	344%	518,390,010	1,669,028,067	322%	322%		
Julia Liletiille										
otal Elletime		Values Accumulat	ted/Discounted to	o 12/31/2020 at Maxir	num Statutory Valuat	ion Interest Rates				
Past Future	890,555,934 67,470,790	Values Accumulat 1,109,735,965 666,679,912	ted/Discounted to 125% 988%	12/31/2020 at Maxir 125% 988%	num Statutory Valuat 890,555,934 83,956,578	ion Interest Rates 1,109,735,965 644,842,936	125% 768%	125% 768%		

1/16/2022 LTLR NW

Exhibit 4a

Continental Casualty Company

LTC1 - Policy Forms with Lifetime Benefits & Standard Inflation

Pennsylvania Specific Experience and Projections

Very Colors Col			Without Rat	Without Rate Increase With 34.5% Cumulative Rate Increase				With 34.5% Cumulative Rate Increase		
1989 -	Year									
1986					Historical					
1992		-	-		0%	-	-			
1992 1.5		-	-			-	-			
1985 1986		-	-			-	-			
1500 1500										
1966 889-918 375-599 475 1176 883-818 375-599 476 1476										
1967 881,260 196,412 23% 144% 891,300 196,412 23% 144% 891,300 196,412 23% 144% 891,300 196,412 23% 144% 147,778 891, 22% 23% 24	1995	929,096	990	0%	1%	929,096	990	0%	1%	
9998 B-6,602 923,005 69% 27% B-64,602 92.00 69% 27% B-64,000 92% B-										
2000	1998	854,662	593,905	69%	23%	854,662	593,905	69%	23%	
2001 780-264 564-886 71% 30% 728-364 564-886 71% 30% 200.										
2003 9.34 648 150.767 199% 34% 854.546 150.777 199% 34% 64.546 150.777 199% 34% 64.546 150.707 1995 35% 449% 349% 349% 349% 349% 349% 349% 349										
2004 1,00,016 975,500 5974 40% 1,003,500 975,500 5976 40% 40% 1,005,701 1,284,146 177% 40% 40% 1,005,701 1,284,146 177% 40% 40% 1,005,701 1,284,146 177% 40%										
2000										
2007 981.447 3.441.640 351% 252% 261.447 3.441.646 351% 252%										
2008 946_275 937_449 99% 83% 946_275 937_249 99% 83% 85% 946_275 937_249 99% 83% 85% 946_275 937_249 99% 83% 85% 946_275 937_249 99% 85% 85% 946_275 937_249 99% 85% 85% 946_275 937_249 99% 85% 946_275 937_249 99% 85% 946_275 937_249 99% 95% 946_275 937_249 99% 95% 946_275 937_249 95% 9										
2010 878-468 1,080.431 12314 9774 988	2008	946,275	937,248	99%	83%	946,275	937,248	99%	83%	
2011 948,315 2,060,335 207% 98% S2,619 1,052,053 207% 98% 1070% 10										
2013 879.668 3.281,114 529 151% 119% 69.768 2.281,114 273% 119% 129% 129% 129% 129% 129% 129% 129										
2014 983,766										
2016 202-847 4-14-0.04 533% 135% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 705-612 2-72-381 363% 143% 363% 3										
2017 910,727 3, 972,981 459% 1559% 1579, 88 63,249 3597 657% 172% 172% 172% 172% 172% 172% 172% 17		828,497								
2018										
TOTAL Actual 24.779.942										
Total Actual 24,279,942	2019	813,061		327%	178%	813,061	2,655,996	327%	178%	
2021 761.060										
2021	Total 7 total	21,210,012	10,010,022	20170		21,210,012	10,010,022	20170	20170	
2022 668 521 5.127.065 734% 230% 679.235 5.168.781 588% 228% 2024 574.600 5.152.13 800% 227% 788.513 4.885.609 602% 231% 2024 574.600 5.152.13 800% 227% 788.513 4.885.609 602% 231% 231% 2026 24.600 5.152.13 800% 207% 788.513 4.885.609 602% 231% 231% 2027 402.53 5.460.72 11.500.80 602% 231% 2027 402.53 5.460.72 11.500.80 602% 231% 2027 402.53 5.460.72 11.500.80 602% 231% 2028 300.576 5.460.72 11.500.80 602% 231% 2028 300.576 5.460.72 11.500.80 602% 231% 2028 300.576 5.460.72 11.500.80 602% 231% 2028 300.576 5.460.72 11.500.80 602% 231% 2028 300.576 5.260.50 162 1707.4% 300% 2029 301.888 5.287.985 1752% 332% 332% 337.973 5.663.727 1903% 314% 2029 2030 227.451 4.400.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 4.000.80 77.00 221% 300.80 227.541 5.000.80 221% 300.80 227.541 5.000.80 221% 300.80 227.541 5.000.80 200.80 227.541 5.000.80 200.80	2021	761,080	4,413,597	580%		806,345	4,374,493	543%	215%	
2024	2022	698,921	5,127,065			879,253	5,168,781			
2025 514,967 5,277,169 1029% 271% 661,813 5,082,505 765% 263% 275% 2027 402,535 5,466,724 1359% 301% 517,221 5,224,648 1010% 289% 279% 2028 300,779 3406,435 1359% 301% 517,221 5,224,648 1010% 289% 279% 2020 227,519 3,468,435 1025% 301%										
2027 402,535 5,466,724 1358% 301% 517,321 5,224,545 1010% 288% 2028 305,676 5,466,431 1524% 317% 450,546 5,166,526 1147% 301% 2029 301,888 5,287,8985 1752% 332% 332% 387,973 5,053,727 1303% 314% 2030 277,451 4,808,007 2211% 300% 278,451 1468% 327% 2031 277,518 4,808,007 2211% 300% 278,451 1468% 327% 2031 277,518 4,808,007 2211% 300% 278,451 1468% 327% 2031 277,518 4,488,007 2211% 300% 278,451 1468% 327% 2031 277,518 4,488,007 2211% 300% 278,451 1468% 328% 2033 150,846 4,485,773 1644% 328% 2033 150,846 4,485,773 1644% 328% 2033 150,846 4,487,709 2710% 328% 405% 158,865 3,530,731 2221% 328% 2033 150,846 3,567,739 305% 158,866 3,560,731 2221% 370% 2035 100,285 3,267,379 3,278% 2055 100,285 3,267,379 3,278% 2055 100,285 3,267,379 3,278% 2055 100,285 3,278,748 3515% 413% 100,367 2,701,445 2614% 365% 2037 63,743 2,880,268 3,380,731 2221% 370% 2039 38,604 11,861,165 3389% 426% 64,144 1,962,357 226% 305% 2039 38,604 1,823,142 4454% 455% 435% 37,886 11,254,368 33,25% 405% 2044 2242 425% 378% 2040 238,460 11,313,142 4454% 455% 37,886 11,254,368 33,25% 405% 2044 2242 427% 3454 652,682 5159% 442% 15,761 604,654 333,375 405% 2044 2242 47,654 4454 455% 445% 455% 64,644 41,664 43,664 43,664 42,664 42,664 43,664 42,664 43,664 42,664 43,664 42,664 43,664 42,664 43,664 42,664 43,664 42,664 43,664 42,664 42,664 43,664 42,6	2025	514,967							263%	
2028 390,576 \$-406,431 1542% 317% 450,546 \$-16,0546 1147% 301% 3018 3018 \$2029 301,888 \$2,278,985 1275,576 322% 301,888 \$2,278,985 1275,576 322% 316,885 \$2,278,985 1275,576 322% 316,885 \$2,278,985 1275,576 322% 3278,546 320,886 4 4,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3278,546 44,857,378 1468% 329% 3269% 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 1468% 3278,546 44,857,378 14,										
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2032 182,041 4,465,076 2453% 373% 233,952 4,267,273 182,4% 350% 360% 2034 123,863 3,604,432 2267% 3369% 156,965 3,50,731 2221% 370% 2005 100,235 3,267,379 3258% 405% 128,865 3,122,861 3,267,379 272,78% 3269% 405% 128,865 3,122,861 3,267,379 272,189 3,267,379 3258% 413% 103,367 2,701,945 2261,478 3859% 2036 3,404,478 2,267,189 3,515% 413% 103,367 2,701,945 2,261,478 3859% 233,960 3,604,41 2,261,478 3,267,478 413% 413% 443,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422,678 413,678 422										
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2036										
2036 8 80.431 2.827.189 3515% 413% 103.867 2.701,945 2614% 3855% 2037 63.742 2.392,083 3753% 420% 81.919 2.286.14 2791% 3927% 2039 49.912 1.991,165 3989% 426% 64.144 1.902,957 2867% 397% 2040 29.484 1.313,142 4454% 435% 37.892 1.254,969 3312% 405% 2041 22.251 1.039,263 4671% 438% 28.896 99.92.4 3473% 407% 2042 16,600 813,358 4900% 440% 21.333 777,326 3444% 410% 2044 12.2551 1.039,263 5159% 442% 15,761 604,663 3836% 410% 2044 8,992 487,664 5423% 444% 11,566 460,051 4033% 413% 2044 8,992 487,664 5423% 444% 11,566 460,051 4033% 413% 2045 8,992 487,664 5423% 444% 11,566 460,051 4033% 413% 2046 4,806 283,460 5887% 446% 61,777 270,894 4886% 414% 2046 4,806 283,460 5887% 446% 4,665 203,700 4881% 416% 2049 2,203 139,871 6160% 4465% 4,665 203,700 4881% 415% 2049 2,203 139,871 6880% 447% 3,3413 165,196 4440% 410% 2049 2,203 139,871 6880% 447% 3,3413 165,196 4440% 410% 2050 1,384 115,968 7279% 446% 1,664 85,172 598,887 7740% 446% 1,665 85,000 133,675 5124% 416% 2050 1,384 115,968 7279% 446% 1,664 85,172 598,887 7740% 446% 1,868 31,368 85,042 6215% 416% 2055 657 72,083 10665% 4469% 1,386 85,042 6215% 417% 2055 657 72,083 10665% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 417% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 419% 2055 656 89,894 85,359% 4469% 1,386 85,042 6215% 419% 2055 666 89,894 85,359% 4469% 1,386 85,042 6215% 419% 2055 666 89,894 85										
2038	2036			3515%	413%					
2039 38.604 1,623,912 4221% 431% 49.612 1,557,134 3139% 401% 2040 29.484 1,3131,42 4454% 435% 37.882 1,259,969 3312% 405% 2041 22.251 1,039,263 4671% 438% 28.596 993,224 3473% 407% 2043 12.264 632,682 5159% 442% 15,761 604,654 3363% 411% 2044 8,992 487,664 5423% 444% 11,556 466,051 4033% 413% 2045 6,571 373,021 5677% 445% 8,444 356,496 4222% 414% 2046 4,806 223,450 5897% 446% 6,177 270,894 4386% 414% 2047 3,545 213,374 6160% 446% 4,556 200,700 4891% 415% 2049 2,030 139,871 6890% 447% 3,413 165,196 4440% 415% 2049 2,030 139,871 6890% 447% 2,009 133,675 5124% 416% 2050 1,594 115,888 7276% 448% 1,654 95,175 5756% 416% 2051 1,287 99,887 7740% 448% 1,654 95,175 5756% 416% 2053 897 81,764 9111% 449% 1,684 95,175 5756% 417% 2053 897 81,764 9111% 449% 1,153 73,142 677,85% 417% 2055 657 72,083 10,665 449% 845 68,890 3144% 417% 2055 657 72,083 10,666% 449% 845 68,890 8144% 417% 2056 566 69,495 12276% 449% 845 68,890 8144 817% 2057 485 65,819 135,669% 449% 623 62,903 69,447 410% 2050 360 59,024 16,866% 450% 59,409 19,226% 419% 2050 390 59,024 16,866% 450% 59,409 59,447 19,99% 419% 2050 390 59,024 16,866% 450% 59,409 59,448 59,449 2050 390 300										
2041										
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2075 1 114 16462% 451% 1 109 12242% 419% 2076 0 51 15010% 451% 0 49 11162% 419% 2077 0 21 13217% 451% 0 20 9829% 419% 2078 0 8 11537% 451% 0 7 8579% 419% 2079 0 2 9963% 451% 0 2 7409% 419% Fotal Projected 6,081,117 87,216,115 1434% 1434% 7,624,456 84,011,258 1102% 1102% Total Lifetime 30,361,059 136,861,437 451% 451% 31,904,398 133,656,580 419% 419% Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% 55,050,537 954% 954%										
2076 0 51 15010% 451% 0 49 11162% 419% 2077 0 21 13217% 451% 0 20 9829% 419% 2078 0 8 11537% 451% 0 7 8579% 419% 2079 0 2 9963% 451% 0 2 7409% 419% Total Projected 6.081,117 87,216,115 1434% 1434% 7,624,456 84,011,258 1102% 1102% Total Lifetime 30,361,059 136,861,437 451% 451% 31,904,398 133,656,580 419% 419% Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% 57,773,139 55,050,537 954% 954%										
2078 0 8 11537% 451% 0 7 8579% 419% 2079 0 2 9963% 451% 0 2 7409% 419% Total Projected 6,081,117 87,216,115 1434% 1434% 7,624,456 84,011,258 1102% 1102% Total Lifetime 30,361,059 136,861,437 451% 451% 31,904,398 133,656,580 419% 419% Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 53,574,976 74,871,043 140% 53,574,976 74,871,043 140% 53,574,976 74,871,043 140% 53,574,976 74,871,043 140% 54,650 56,966,459 1229% 5,773,139 55,050,537 954% 954%	2076	0	51	15010%	451%	0	49	11162%	419%	
2079 0 2 9963% 451% 0 2 7409% 419% Total Projected 6,081,117 87,216,115 1434% 1434% 7,624,456 84,011,258 1102% 1102% Total Lifetime 30,361,059 136,861,437 451% 451% 31,904,398 133,656,580 419% 419% Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% Future 4,636,178 56,966,459 1229% 1229% 5,773,139 55,050,537 954% 954%										
Total Lifetime 30,361,059 136,861,437 451% 451% 31,904,398 133,656,580 419% 419% Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% Future 4,636,178 56,966,459 1229% 1229% 5,773,139 55,050,537 954% 954%	2079	0	2	9963%	451%	0	2	7409%	419%	
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% Future 4,636,178 56,966,459 1229% 1229% 5,773,139 55,050,537 954% 954%	otal Projected	6,081,117	87,216,115	1434%	1434%	7,624,456	84,011,258	1102%	1102%	
Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% Future 4,636,178 56,966,459 1229% 1229% 5,773,139 55,050,537 954% 954%	Total Lifetime	30,361,059	136,861,437	451%	451%	31,904,398	133,656,580	419%	419%	
Past 53,574,976 74,871,043 140% 140% 53,574,976 74,871,043 140% 140% Future 4,636,178 56,966,459 1229% 1229% 5,773,139 55,050,537 954% 954%			Values Accumula	ted/Discounted to	o 12/31/2020 at Maxi	mum Statutory Valuat	ion Interest Rates			
			74,871,043	140%	140%	53,574,976	74,871,043	140%		
	Future Lifetime	4,636,178 58,211,154	56,966,459 131,837,502	1229% 226%	1229% 226%	5,773,139 59,348,115	55,050,537 129,921,580	954% 219%	954% 219%	

1/16/2022 LTLR State

Exhibit 1b

Continental Casualty Company
Premier Classic - Policy Forms with Lifetime Benefits & Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide
Without Increase	\$2,768
With Increase	\$3,523

Pennsylvania					
\$3,282					
\$4,177					

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide
Insureds Not on Claim	2,027
Insureds on Claim	373
Total Insureds	2,400
2020 Annualized Premium	\$6,644,346

Pennsylvania					
191					
43					
234					
\$767,911					

Insureds Not Eligible for Rate Increase

	Nationwide
Non-Forfeiture Insureds Not on Claim	187
Non-Forfeiture Insureds on Claim	6
Paid-Up Limited Pay Insureds Not on Claim	0
Paid-Up Limited Pay Insureds on Claim	0
Total Non-Forfeiture and Paid-Up Insureds	193

Pennsylvania
39
1
0
0
40

18) History of Rate Adjustments

SERFF Number	Approval Date
N/A	7/10/2003
CNAB-127154621	9/2/2011
CNAB-130150831	3/23/2016
CNAB-131276497	4/3/2018
CNAB-132346264	8/22/2020

Rate Increase Approved
50.0%
25.0%*
20.0%
20.0%**
5.0%

Implemented over a two-year period (11.8%, 11.8%)*
Implemented over a two-year period (9.54%, 9.54%)**

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	156%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

1/16/2022 Inforce Exhibit

Exhibit 2b
Continental Casualty Company
Premier Classic - Policy Forms with Lifetime Benefits & Standard Inflation
Distribution of Inforce Insureds Eligible for Rate Increase
Pennsylvania

				ationwide					nnsylvania	
	_	Count	% of Count	Premium	% of Premium	<u> </u>	Count	% of Count	Premium	% of Premium
	1987	0	0%	\$0	0%		0	0%	\$0	0%
	1988	0	0%	\$0	0%		0	0%	\$0	0%
	1989	0	0%	\$0	0%		0	0%	\$0	0%
	1990	0	0%	\$0 \$0	0% 0%		0	0%	\$0	0% 0%
	1991 1992	0	0%	\$0	0%		0	0% 0%	\$0 \$0	0%
	1993	40	2%	\$97,999	1%		0	0%	\$0	0%
	1993	628	26%	\$1,662,666	25%		77	33%	\$236,557	31%
	1995	782	33%	\$2,138,499	32%		59	25%	\$180,835	24%
	1996	703	29%	\$2,029,110	31%		88	38%	\$317,146	41%
	1997	127	5%	\$348,881	5%		8	3%	\$25,482	3%
	1998	109	5%	\$335,757	5%		1	0%	\$4,126	1%
	1999	11	0%	\$31,433	0%		1	0%	\$3,766	0%
	2000	0	0%	\$0	0%		0	0%	\$0	0%
_	2001	0	0%	\$0	0%		0	0%	\$0	0%
Issue Year	2002	0	0%	\$0	0%		0	0%	\$0	0%
, o	2003	0	0%	\$0	0%		0	0%	\$0	0%
ns	2004	0	0%	\$0	0%		0	0%	\$0	0%
<u> </u>	2005	0	0%	\$0	0%		0	0%	\$0	0%
	2006	0	0%	\$0	0%		0	0%	\$0	0%
	2007	0	0%	\$0	0%		0	0%	\$0	0%
	2008	0	0%	\$0	0%		0	0%	\$0	0%
	2009	0	0%	\$0	0%		0	0%	\$0	0%
	2010	0	0%	\$0	0%		0	0%	\$0	0%
	2011	0	0%	\$0	0%		0	0%	\$0	0%
	2012	0	0%	\$0	0%		0	0%	\$0	0%
	2013	0	0%	\$0	0%		0	0%	\$0	0%
	2014	0	0%	\$0	0%		0	0%	\$0	0%
	2015	0	0%	\$0	0%		0	0%	\$0	0%
	2016	0	0%	\$0	0%		0	0%	\$0	0%
	2017	0	0%	\$0	0%		0	0%	\$0	0%
	2018	0	0%	\$0	0%		0	0%	\$0	0%
	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
	<35	2	0%	\$4,546	0%		0	0%	\$0	0%
	35-39	11	0%	\$16,726	0%		2	1%	\$2,897	0%
	40-44	44	2%	\$80,379	1%		2	1%	\$4,668	1%
	45-49	290	12%	\$549,623	8%		24	10%	\$50,135	7%
Φ	50-54	563	23%	\$1,256,403	19%		60	26%	\$155,746	20%
ssue Age	55-59	687	29%	\$1,887,032	28%		78	33%	\$263,270	34%
e	60-64	588	25%	\$1,932,487	29%		54	23%	\$217,919	28%
<u>ss</u>	65-69	197	8%	\$825,797	12%		12	5%	\$61,540	8%
	70-74	16	1%	\$70,520	1%		2	1%	\$11,736	2%
	75-79	2	0%	\$20,832	0%		0	0%	\$0	0%
	80+	0	0%	\$0	0%		0	0%	\$0	0%
	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
	-	-								
	<45	0	0%	\$0	0%		0	0%	\$0	0%
	45-49	0	0%	\$0	0%		0	0%	\$0	0%
	50-54	1	0%	\$1,578	0%		0	0%	\$0	0%
Age	55-59	4	0%	\$9,349	0%		0	0%	\$0	0%
	60-64	12	1%	\$19,615	0%		4	1%	\$2,897	0%
ped	65-69 70-74	56 296	2% 12%	\$102,746 \$586,935	2% 9%		19	2% 8%	\$9,199 \$41,680	1% 5%
Attair	70-74 75-79	296 544	23%	\$1,233,762	19%		54	23%	\$41,689 \$141,028	18%
¥	80-84	652	27%	\$1,779,502	27%		88	38%	\$288,759	38%
	85-89	587	24%	\$1,779,302	29%		49	21%	\$189,573	25%
	90+	248	10%	\$980,728	15%		18	8%	\$94,766	12%
	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
			10070	40,011,010	10070			10070	4.01,011	100,0
<u>e</u>	Male	868	36%	\$2,454,991	37%		80	34%	\$266,526	35%
Gender	Female	1,532	64%	\$4,189,355	63%		154	66%	\$501,385	65%
9	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
Inflation Type	None	0	0%	\$0	0%		0	0%	\$0	0%
ati	Simple	1,036	43%	\$2,743,965	41%		101	43%	\$317,657	41%
<u> </u>	Compound	1,364	57%	\$3,900,380	59%		133	57%	\$450,254 \$767,911	59%
	Total	2,400	100%	\$6,644,346	100%	I	234	100%	\$101,9TT	100%
-10	TQ	0	0%	\$0	0%		0	0%	\$0	0%
Tax	NTQ	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
Tax Status	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
			100/0	+ + + + + + + + + + + + + + + + + + + +	10070	<u> </u>		10070	+101,011	100/0
	Lifetime	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
Max Benefit	Not Lifetime	0	0%	\$0	0%		0	0%	\$0	0%
≥ 8	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
								•		
> 0	Facility Only	0	0%	\$0	0%		0	0%	\$0	0%
Cov	Comprehensive	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%
	Total	2,400	100%	\$6,644,346	100%		234	100%	\$767,911	100%

Exhibit 3b

Continental Casualty Company

Premier Classic - Policy Forms with Lifetime Benefits & Standard Inflation

Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year		Without Rate Increase			With 27.3% Cumulative Rate Increase			
	Earned	Incurred	Annual Loss	Cumulative Loss	Earned	Incurred	Annual Loss	Cumulative L
	Premium	Claims	Ratio	Ratio	Premium	Claims	Ratio	Ratio
				Historical				
1988 1989			0% 0%	0% 0%	:		0% 0%	0% 0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	- 29.450	-	0% 0%	0% 0%	- 20 450	-	0% 0%	0% 0%
1993 1994	28,459 1,524,387	149,304	10%	10%	28,459 1,524,387	149,304	10%	10%
1995	4,960,434	50,724	1%	3%	4,960,434	50,724	1%	3%
1996	7,432,845	715,259	10%	7%	7,432,845	715,259	10%	7%
1997 1998	8,854,896 9,182,765	323,987 1,841,868	4% 20%	5% 10%	8,854,896 9,182,765	323,987 1,841,868	4% 20%	5% 10%
1999	9,076,377	4,339,067	48%	18%	9,076,377	4,339,067	48%	18%
2000	8,826,012	2,011,809	23%	19%	8,826,012	2,011,809	23%	19%
2001	8,545,269	4,276,238	50%	23%	8,545,269	4,276,238	50%	23%
2002 2003	8,318,290 8,051,207	4,348,694 4,006,260	52% 50%	27% 29%	8,318,290 8,051,207	4,348,694 4,006,260	52% 50%	27% 29%
2004	11,385,599	3,542,812	31%	30%	11,385,599	3,542,812	31%	30%
2005	11,336,272	7,821,522	69%	34%	11,336,272	7,821,522	69%	34%
2006	10,337,368	6,220,685	60% 51%	37%	10,337,368	6,220,685	60%	37%
2007 2008	10,128,677 9,788,820	5,215,041 8,276,128	85%	38% 42%	10,128,677 9,788,820	5,215,041 8,276,128	51% 85%	38% 42%
2009	9,369,766	12,018,292	128%	48%	9,369,766	12,018,292	128%	48%
2010	8,937,347	15,216,895	170%	55%	8,937,347	15,216,895	170%	55%
2011 2012	8,570,691	17,004,427	198% 226%	63%	8,570,691	17,004,427	198% 226%	63%
2012	8,968,196 9,318,195	20,300,975 20,778,593	223%	72% 80%	8,968,196 9,318,195	20,300,975 20,778,593	223%	72% 80%
2014	8,872,765	17,274,919	195%	86%	8,872,765	17,274,919	195%	86%
2015	8,194,356	21,771,174	266%	93%	8,194,356	21,771,174	266%	93%
2016 2017	8,170,032 8,462,788	22,015,630 27,426,277	269% 324%	101% 110%	8,170,032 8,462,788	22,015,630 27,426,277	269% 324%	101% 110%
2017	7,922,749	25,017,407	324% 316%	117%	7,922,749	25,017,407	324%	110%
2019	7,707,516	36,704,388	476%	130%	7,707,516	36,704,388	476%	130%
2020	7,917,896	25,082,970	317%	136%	7,917,896	25,082,970	317%	136%
Total Actual	230,189,973	313,751,343	136%	136%	230,189,973	313,751,343	136%	136%
				Projected				
2021	7,728,773	31,050,609	402%	145%	8,093,223	30,833,255	381%	145%
2022 2023	6,998,388 6,275,721	34,322,320 31,274,611	490% 498%	155% 163%	8,441,348 7,707,461	34,903,225 31.688.999	413% 411%	154% 162%
2023	5,589,206	31,023,308	555%	172%	6,864,325	29.937.492	436%	162%
2025	4,939,324	30,403,098	616%	180%	6,066,180	29,338,990	484%	176%
2026	4,329,825	29,597,225	684%	188%	5,317,630	28,561,322	537%	183%
2027 2028	3,763,836	28,664,927	762% 850%	196% 204%	4,622,516	27,661,655 26.572,222	598% 667%	190% 197%
2028	3,241,416 2,764,760	27,535,982 26,182,291	947%	212%	3,980,911 3,395,511	25,572,222	744%	203%
2030	2,340,946	24,710,791	1056%	219%	2,875,008	23,845,913	829%	209%
2031	1,969,053	23,146,464	1176%	225%	2,418,271	22,336,337	924%	215%
2032 2033	1,644,825	21,522,069	1308% 1457%	232% 238%	2,020,075	20,768,797	1028% 1145%	221% 226%
2033	1,364,133 1,122,805	19,876,787 18,147,588	1616%	243%	1,675,346 1,378,961	19,181,100 17,512,422	1270%	231%
2035	917,217	16,358,189	1783%	248%	1,126,471	15,785,653	1401%	236%
2036	743,476	14,529,624	1954%	253%	913,092	14,021,087	1536%	240%
2037	597,718	12,744,920	2132%	256%	734,081	12,298,848	1675%	243%
2038 2039	476,439 376,572	11,035,255 9,408,036	2316% 2498%	260% 263%	585,134 462,483	10,649,021 9,078,755	1820% 1963%	246% 249%
2040	295,054	7,903,987	2679%	265%	362,368	7,627,347	2105%	251%
2041	229,305	6,535,210	2850%	267%	281,619	6,306,478	2239%	253%
2042	176,764	5,347,415	3025%	269%	217,091	5,160,255	2377%	255%
2043 2044	135,174 102,659	4,326,895 3,446,293	3201% 3357%	270% 272%	166,013 126,079	4,175,454 3,325,672	2515% 2638%	256% 257%
2045	77,512	2,710,218	3497%	272%	95,196	2,615,360	2747%	258%
2046	58,282	2,107,534	3616%	273%	71,579	2,033,771	2841%	258%
2047	43,720	1,644,193	3761%	274%	53,695	1,586,646	2955%	259%
2048 2049	32,759 24,564	1,293,643 1.021.183	3949% 4157%	274% 274%	40,233 30.169	1,248,366 985,442	3103% 3266%	259% 259%
2050	18,474	815,484	4414%	275%	22,689	786,942	3468%	260%
2051	13,960	649,141	4650%	275%	17,145	626,421	3654%	260%
2052	10,599	526,517	4968%	275%	13,017	508,089	3903%	260%
2053 2054	8,089 6,203	425,503 343,534	5260% 5538%	275% 275%	9,935 7,619	410,611 331,511	4133% 4351%	260% 260%
2055	4,767	280,434	5883%	275%	5,854	270,618	4622%	260%
2056	3,667	226,743	6184%	275%	4,503	218,807	4859%	260%
2057	2,815	183,032	6503%	275%	3,457	176,626	5110%	260%
2058 2059	2,139 1,612	145,889 113,424	6821% 7038%	276% 276%	2,627 1,979	140,783 109,454	5360% 5530%	260% 261%
2060	1,198	86,564	7223%	276%	1,472	83,534	5675%	261%
2061	879	64,181	7302%	276%	1,079	61,935	5738%	261%
2062	633	46,213	7299%	276%	778	44,596	5735%	261%
2063 2064	447 309	33,408 23,993	7474% 7771%	276% 276%	549 379	32,239 23,153	5872% 6106%	261% 261%
2065	207	16,698	8070%	276%	254	16,113	6341%	261%
2066	134	10,926	8155%	276%	165	10,544	6408%	261%
2067	84	6,629	7866%	276%	103	6,397	6180%	261%
2068 2069	52 31	3,920 2,250	7593% 7305%	276% 276%	63 38	3,783 2,171	5966% 5740%	261% 261%
2070	18	1,250	6993%	276%	22	1,207	5495%	261%
2071	10	676	6708%	276%	12	652	5271%	261%
	5	355	6463%	276%	7	342	5078%	261%
2072	3 1	180 89	6260% 6104%	276% 276%	4 2	174 86	4918% 4796%	261% 261%
2073		42	5901%	276%	1	40	4637%	261%
	0	18	5372%	276%	0	17	4221%	261%
2073 2074 2075 2076		7	4616%	276%	0	7	3627%	261%
2073 2074 2075 2076 2077	0	-	3878%	276%	0	2	3047% 2496%	261%
2073 2074 2075 2076 2077 2078	0	2 1	3176%					/h1%
2073 2074 2075 2076 2077 2078 2079			3176% 825%	276% 825%	70,215,821	469,172,651	668%	261% 668%
2073 2074 2075 2076 2077 2078 2079 otal Projected	0 0 58,436,566	1 481,877,769	825%	825%	70,215,821	469,172,651	668%	668%
2073 2074 2075 2076 2077 2078	0 0	1						
2073 2074 2075 2076 2077 2078 2079 otal Projected	0 0 58,436,566	1 481,877,769 795,629,113	825% 276%	825% 276%	70,215,821	469,172,651 782,923,994	668%	668%
2073 2074 2075 2076 2077 2078 2079 otal Projected	0 0 58,436,566	1 481,877,769 795,629,113	825% 276%	825% 276%	70,215,821 300,405,794	469,172,651 782,923,994	668%	668%

1/16/2022 LTLR NW

Exhibit 4b

Continental Casualty Company

Premier Classic - Policy Forms with Lifetime Benefits & Standard Inflation

Pennsylvania Specific Experience and Projections

		Without Rate	e Increase		With 27.3% Cumulativ		ve Rate Increase	
Year	Earned	Incurred	Annual Loss	Cumulative Loss	Earned	Incurred	Annual Loss	Cumulative Loss
	Premium	Claims	Ratio	Ratio	Premium	Claims	Ratio	Ratio
				Historical				
1988	-	-	0%	0%	-	-	0%	0%
1989 1990	-	-	0% 0%	0% 0%	-		0% 0%	0% 0%
1991	-		0%	0%			0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993 1994	- 146,575	-	0% 0%	0% 0%	- 146,575	-	0% 0%	0% 0%
1995	553,079	9,493	2%	1%	553,079	9,493	2%	1%
1996 1997	816,815 988,513	-	0% 0%	1% 0%	816,815 988,513	-	0% 0%	1% 0%
1998	966,195	6,804	1%	0%	966,195	6,804	1%	0%
1999	956,642	343,677	36%	8%	956,642	343,677	36%	8%
2000 2001	921,505 876,200	288,250 312,073	31% 36%	12% 15%	921,505 876,200	288,250 312,073	31% 36%	12% 15%
2002	849,093	334,855	39%	18%	849,093	334,855	39%	18%
2003 2004	842,678 1,057,819	295,791 461,053	35% 44%	20% 23%	842,678 1,057,819	295,791 461,053	35% 44%	20% 23%
2005	1,137,611	1,509,379	133%	35%	1,137,611	1,509,379	133%	35%
2006 2007	1,034,137 1,000,780	1,514,805 440,989	146% 44%	46% 45%	1,034,137 1,000,780	1,514,805 440,989	146% 44%	46% 45%
2008	974,542	456,293	47%	46%	974,542	456,293	47%	46%
2009	920,444	990,197	108%	50%	920,444	990,197	108%	50%
2010 2011	900,215 860,273	2,057,924 932,612	229% 108%	60% 63%	900,215 860,273	2,057,924 932,612	229% 108%	60% 63%
2012	873,992	2,737,211	313%	76%	873,992	2,737,211	313%	76%
2013	919,611	6,008,942	653%	106%	919,611	6,008,942	653%	106%
2014 2015	903,283 865,778	981,898 2,196,964	109% 254%	106% 113%	903,283 865,778	981,898 2,196,964	109% 254%	106% 113%
2016	823,926	2,953,284	358%	123%	823,926	2,953,284	358%	123%
2017 2018	859,116 819,520	4,131,632 2,035,702	481% 248%	138% 142%	859,116 819,520	4,131,632 2,035,702	481% 248%	138% 142%
2019	767,071	4,454,711	581%	157%	767,071	4,454,711	581%	157%
2020	691,954	3,510,615	507%	167%	691,954	3,510,615	507%	167%
Total Actual	23,327,365	38,965,156	167%	167%	23,327,365	38,965,156	167%	167%
				Projected				
2021 2022	757,481 685,335	3,103,482 3,524,795	410% 514%	175% 184%	793,200 826,641	3,081,758 3,584,452	389% 434%	174% 183%
2023	614,511	3,290,732	536%	193%	754,706	3,334,334	442%	191%
2024	547,757	3,316,018	605%	201%	672,722	3,199,957	476%	198%
2025 2026	484,263 424,297	3,292,477 3,220,202	680% 759%	210% 219%	594,742 521,096	3,177,240 3,107,495	534% 596%	205% 213%
2027	368,193	3,111,478	845%	227%	452,192	3,002,577	664%	220%
2028	315,786	2,965,499	939%	235%	387,829	2,861,706	738%	227%
2029 2030	267,726 224,845	2,776,434 2,581,040	1037% 1148%	243% 250%	328,805 276,142	2,679,259 2,490,703	815% 902%	234% 240%
2031	187,132	2,375,648	1270%	257%	229,824	2,292,501	998%	246%
2032 2033	154,383 126,175	2,168,559 1,954,695	1405% 1549%	263% 269%	189,604 154,960	2,092,659 1,886,281	1104% 1217%	252% 257%
2034	102,163	1,734,685	1698%	274%	125,471	1,673,971	1334%	261%
2035	82,042	1,521,810	1855%	279%	100,759	1,468,546	1457%	265%
2036 2037	65,268 51,438	1,317,536 1,129,153	2019% 2195%	283% 286%	80,158 63,173	1,271,422 1,089,632	1586% 1725%	269% 272%
2038	40,166	955,017	2378%	289%	49,329	921,591	1868%	275%
2039 2040	31,074 23,821	795,287 654,889	2559% 2749%	291% 293%	38,163 29,255	767,452 631,968	2011% 2160%	277% 279%
2040	18,103	532,075	2939%	295%	22,233	513,453	2309%	280%
2042	13,644	428,697	3142%	296%	16,757	413,693	2469%	281%
2043 2044	10,203 7,581	345,646 277,873	3388% 3665%	298% 298%	12,531 9,311	333,548 268,147	2662% 2880%	282% 283%
2045	5,591	225,033	4025%	299%	6,866	217,157	3163%	284%
2046 2047	4,092 2,977	179,471 142,138	4386% 4774%	300% 300%	5,025	173,189 137,163	3447% 3751%	284% 285%
2047	2,157	112,078	5197%	301%	3,656 2,649	108,155	4084%	285%
2049	1,555	88,080	5662%	301%	1,910	84,997	4449%	285%
2050 2051	1,119 804	69,431 54,669	6203% 6802%	301% 301%	1,375 987	67,001 52,756	4874% 5345%	286% 286%
2052	576	42,974	7461%	301%	707	41,470	5863%	286%
2053 2054	411 290	33,877 25,773	8234% 8896%	302% 302%	505 356	32,691 24,871	6470% 6990%	286% 286%
2055	200	18,272	9132%	302%	246	17,632	7175%	286%
2056 2057	137 92	12,221 7,763	8949% 8453%	302% 302%	168 113	11,793 7,492	7032%	286% 286%
2057	92 61	4,793	7920%	302%	74	7,492 4,625	6642% 6223%	286%
2059	39	2,874	7382%	302%	48	2,774	5800%	286%
2060 2061	24 15	1,677 951	6887% 6470%	302% 302%	30 18	1,618 918	5411% 5084%	286% 286%
2062	9	523	6130%	302%	10	505	4817%	286%
2063 2064	5	277 141	5833% 5549%	302% 302%	6	267 136	4583% 4360%	286% 286%
2065	1	67	5191%	302%	2	65	4079%	286%
2066	1	30	4764%	302%	1	29	3743%	286%
2067 2068	0	12 5	4220% 3714%	302% 302%	0	12 4	3316% 2919%	286% 286%
2069	0	2	3243%	302%	0	1	2548%	286%
2070 2071	0	0	2834% 2443%	302% 302%	0	0	2227% 1919%	286% 286%
2072	0	0	2051%	302%	0	0	1612%	286%
2073	0	0	1557%	302%	0	0	1224%	286%
2074 2075	0	0	1042% 0%	302% 302%	0 0	0	819% 0%	286% 286%
2076	0	0	0%	302%	0	0	0%	286%
2077 2078	0	-	0% 0%	302% 302%	0		0% 0%	286% 286%
2079	0	-	0%	302%	0	-	0%	286%
Total Projected	5,623,545	48,396,857	861%	861%	6,754,359	47,131,668	698%	698%
Total Lifetime	28,950,910	87,362,013	302%	302%	30,081,724	86,096,823	286%	286%
		Value	- 1/D!	- 40/04/0000		Int		
Past	44,883,363	54,567,360	ted/Discounted to 122%	o 12/31/2020 at Maxii 122%	num Statutory Valuat 44,883,363	ion Interest Rates 54,567,360	122%	122%
Future	4,449,312	34,000,857	764%	764%	5,316,300	33,208,521	625%	625%
Lifetime	49,332,674	88,568,218	180%	180%	50,199,663	87,775,882	175%	175%

1/16/2022 LTLR State



CNA Center 151 North Franklin Street Chicago, IL 60606

www.cna.com

January 16, 2022

Honorable Jessica K. Altman Commissioner Pennsylvania Insurance Department 1326 Strawberry Square Harrisburg, PA 17120

Re: Continental Casualty Company

(NAIC #218-20443, FEIN #36-2114545)

SERFF Tracking #CNAB-133114866 (Form Filing) SERFF Tracking #CNAB-133114867 (Rate Filing)

Endorsement & Rate Increase Filings for Individual Long Term Care Policy Forms:

Product Portfolio	Issue Date Range	Policy Form
LTC 1	1990 to 1998	P1-15203-A37/-A87
Premier/Classic	1002 to 1000	P1-18215-A37/-A87
Premier/Classic	1993 to 1999	P1-18876-A37/-A87

Dear Commissioner Altman:

Enclosed is a request for a premium rate increase for the above captioned long term care policy forms, including all associated riders, issued prior to your state's implementation of rate stability requirements. This increase is requested in order to establish premium rates that are reasonable in relation to benefits based on actual historical experience and best-estimate projections for these forms. The method that we used to determine the requested premium rate increase is outlined in the enclosed actuarial memorandum and supporting exhibits.

The rate increase indication varies by product portfolio, benefit period, and automatic increase benefit (AIB) rider, with rate increases as follows:

LTC1	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	34.5%	0.0%
Non-Lifetime Max Benefits	0.0%	0.0%

Premier/Classic	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	27.3%	0.0%
Non-Lifetime Max Benefits	0.0%	0.0%

Please see the Supplement to Rate Sheet for details on the implementation schedule.

The rate indication aims to achieve equity by bringing rate levels of your state up to the same level as those states that have historically approved all rate increases.

Although a greater increase can be justified, the Company is limiting the rate request at this time. The rate increase request varies by product in order to be sensitive to the age distribution of the policies within each product portfolio.

The proposed premium rates will be effective on the insured's next policy anniversary date following a notification period at least as long as required by your state following approval. No insured will receive more than one rate increase in a 12-month period.

Upon approval of this rate revision, CCC will communicate to insureds their options to reduce the impact of the rate increase. These options may include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit or eliminating optional riders, such as automatic increase riders. Available options will depend upon the insured's current coverage levels, benefit options available under their specific policy form, and any statutory minimum benefit levels in your state.

In addition, the Company is making a number of alternative options available for all insureds in conjunction with this rate increase. The first option provides an Increased Contingent Non-Forfeiture ("ICNF") benefit upon lapse to all insureds regardless of their original issue date, rate increase amount or issue age of the insured. If this benefit is elected by the insured, the insured will not have to pay prospective premium, and their remaining benefit pool amount will equate to 150% of lifetime premiums paid. If a policy lapses due to non-payment of premiums without notifying the Company of their intention to elect the ICNF option, the insured's coverage will default to a standard 100% of lifetime premiums paid contingent non-forfeiture benefit.

The second option that is being offered to insureds is the "Surrender Option". If this option is elected by the insured, the insured will surrender their policy in return for a one-time cash payment from the Company. The amount of the one-time cash surrender payment is equal to the unisex-adjusted statutory active life reserve held for the specific insured.

Both of the above alternative options will be offered to all insureds in your state, regardless of whether or not they receive a rate increase, in order to ensure fairness within these product portfolios. If a policy lapses due to non-payment of premiums without notifying the Company of the insured's intention to elect any of the above options, the insured's coverage will default to a standard 100% CNF benefit.

For states that do not approve the full requested increase, the Company anticipates that additional rate increase filings will be necessary in the near future. The exact timing of when an additional filing will be made and the amount that will be requested will be determined by the attributes of these policy forms, the Company's experience, and applicable laws and regulations.

Included with this request are the following items:

- this cover letter;
- an actuarial memorandum including supporting exhibits;
- a rate supplement page reflecting the rate increase request; and
- a surrender option endorsement.

We respectfully request your favorable consideration and approval of this filing.

Louis Scarim, ASA, MAAA

Actuarial Consulting Director, LTC Inforce Management

(312) 822-6179

louis.scarim@cna.com



May 6, 2022

Michael Humphreys

Acting Insurance Commissioner Pennsylvania Insurance Department 1326 Strawberry Square Harrisburg, PA 17120

Louis Scarim, ASA, MAAA Actuarial Consulting Director Long Term Care Pricing Telephone 312-822-6179 Email louis.scarim@cna.com

Re: Continental Casualty Company (NAIC #218-20443, FEIN#36-2114545) SERFF Tracking # CNAB-133114867 Rate Increase Filing for OP Gen1 (LTC1, Premier/Classic) Individual Long Term Care Policy Forms:

Dear Ms. Romig:

Thank you for your review of the above referenced filing. This letter is in response to your objection dated March 14, 2022. The objection items are restated below in *italics*, with responses in blue:

1. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3a – LTC1 -Policy Forms with Lifetime Benefits & Standard Inflation) for this nationwide block of policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3a (i.e. LTC1 with Lifetime Benefits & Standard Inflation).

Please see the attached "Item 1 – Exhibit 3a Original Rate Level.xlsx" worksheet, containing the adjusted Nationwide exhibit for LTC1 policies With Lifetime Benefits & With Standard Inflation. The experience has been restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

2. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3a (i.e. LTC1 with Lifetime Benefits & Standard Inflation).

Please see the figures shown below:

Total Policies Issued	11,684
Total Policies Inforce	4,469
Percent of Policies Remaining Inforce	38.2%

3. Please provide the cumulative weighted average increase granted on policies in force on his block in PA. Answer this question considering only the policies represented in Exhibit 3a (i.e. LTC1 with Lifetime Benefits & Standard Inflation).

For PA LTC1 policies With Lifetime Benefits & With Standard Inflation (represented in Exhibit 3a), the cumulative rate increase approved amount is 204.2%.

4. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3b — Premier/Classic - Policy Forms with Lifetime Benefits & Standard Inflation) for this nationwide block of policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3a (i.e. Premier/Classic with Lifetime Benefits & Standard Inflation).

Please see the attached "Item 4 – Exhibit 3b_Original Rate Level.xlsx" worksheet, containing the adjusted Nationwide exhibit for Premier/Classic policies With Lifetime Benefits & With Standard Inflation. The experience has been restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

5. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3a (i.e. Premier/Classic with Lifetime Benefits & Standard Inflation).

Please see the figures shown below:

Total Policies Issued	6,614
Total Policies Inforce	2,400
Percent of Policies Remaining Inforce	36.3%

6. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3b (i.e. Premier/Classic with Lifetime Benefits & Standard Inflation).

For PA Premier/Classic policies With Lifetime Benefits & With Standard Inflation (represented in Exhibit 3b), the cumulative rate increase approved amount is 183.5%.

7. Please provide a listing of the past requested increases and approved increases by state for this block. Also include a column showing the cumulative increases approved in each state to date.

Please see the attached "Item 7 - State Status Listing – OP Gen1 (as of 5.03.2022).xlsx" worksheet, containing the rate increase history by state.

8. Please provide the letter that will be sent to policyholders to inform them of the increase and their available options.

Please note that the policyholder notification letters are included in the associated Form Filing under the Supporting Documentation tab — SERFF Tracking # CNAB-133114866, which is currently pending review. Although, we will provide the same letters within this Rate Filing for convenience.

Please see the two attached notification letters to inform policyholders (depending if the policy is subject to the rate increase):

- With Rate Increase: "Item 8 Notification_ILTC_RI_NW_2021 11042021.pdf"
- Without Rate Increase: "Item 8 Notification_ILTC_NoRI_NW_2021 11042021.pdf"
- 9. LTC1 policy forms with lifetime benefits and standard inflation are subject to a 34.5% premium increase. How many LTC1 policy forms are scheduled to receive no premium increase? In other words, the actuarial memo implies there a 354 LTC1 policy forms with lifetime benefits and standard inflation; how many LTC1 policy forms do not have lifetime benefits or do not have standard inflation benefits?

Please see the summary table below, which provides an overview of the PA LTC1 block at the time of the filing. Of the total 805 PA LTC1 policyholders:

- 354 policies are subject to the requested rate increase of 34.5%
- The remaining 451 policies are unaffected by the requested increase in this filing

State	Product	Inflation Benefit		Requested Rate	Policies	An	nualized Premium	
State	Product	Туре	Period	od Increase Infor			Inforce*	
PA	LTC1	Inflation	Lifetime	34.5%	354	\$	798,813	
PA	LTC1	Inflation	Non-Lifetime	0.0%	372	\$	781,375	
PA	LTC1	Non-Inflation	Lifetime	0.0%	23	\$	50,882	
PA	LTC1	Non-Inflation	Non-Lifetime	0.0%	56	\$	84,611	

Total Insureds Eligible for Rate Increase*

10. Premier/Classic policy forms with lifetime benefits and standard inflation are subject to a 27.3% premium increase. How many Premier/Classic policy forms are scheduled to receive no premium increase? In other words, the actuarial memo implies there a 234 Premier/Classic policy forms with lifetime benefits and standard inflation; how many Premier/Classic policy forms do not have lifetime benefits or do not have standard inflation benefits?

Please see the summary table below, which provides an overview of the PA Premier/Classic block at the time of the filing. Of the total 753 PA Premier/Classic policyholders:

- 234 policies are subject to the requested rate increase of 27.3%
- The remaining 519 policies are unaffected by the requested increase in this filing

State	Product	Inflation Type	Benefit Period	Requested Rate Increase	Policies Inforce*	Ann	nualized Premium Inforce*
PA	Premier/Classic	Inflation	Lifetime	27.3%	234	\$	767,911
PA	Premier/Classic	Inflation	Non-Lifetime	0.0%	334	\$	843,102
PA	Premier/Classic	Non-Inflation	Lifetime	0.0%	63	\$	147,565
PA	Premier/Classic	Non-Inflation	Non-Lifetime	0.0%	122	\$	232,346

Total Insureds Eligible for Rate Increase*

11. Please define what "standard inflation means". In other words, were there any policies issued with non-standard inflation options in this block?

Two optional automatic increase benefit riders were available on these policy forms; a 5% simple lifetime benefit and a 5% compound lifetime benefit. Please note that no insureds were issued with non-standard inflation option in this block.

12. Continental Casualty has offered the surrender option in the past. The company also offered a conversion option that provided a paid-up benefit of 100% of premium paid plus a cash payment. What is the approximate percent of policyholders that, when offered a cash surrender option, actually choose to exercise it?

The pilot program conducted over the past year and a half has resulted in approximately 2% of policyholders receiving a cash surrender offer choosing to exercise it.

13. The freeze and drop option eliminates future inflation indexing, maintains the current daily benefit, and lowers future premiums to the non-inflation level at the original issue age. What is the approximate average reduction in premium or what is the approximate range of premium reduction? An exact calculation is not required

The premium load for the automatic increase benefit rider varied by many variables including inflation type (simple or compound), benefit period, rating group, home health care level, and issue age.

A reasonable estimate for the average reduction in premium under the freeze and drop option is 50%.

14. Say a policyholder can purchase \$100 a day without inflation for \$350 per annum. He can purchase the same coverage with 5% compound inflation for \$750 per year. Further say that he purchases the inflation coverage for an annual premium of \$750, waits a little over 9 years until his daily benefit inflates to \$155.13 per day, and then invokes the "freeze and drop" option. Would his new premium be (a) \$350, (b) \$542.96 = (\$155.13/\$100)*(\$350), or (c) something else?

In this scenario, electing the "Freeze and Drop" offer would freeze the policyholder's daily benefit at \$155.13 per day, and the annual premium would drop to the non-inflation premium rate at the original issue age for the original benefit amount. The annual premium rate would drop to \$350.

Please let us know if we can provide additional information to assist in the review of this filing.

Sincerely,

Louis Scarim, ASA, MAAA

P.O Box 64912 St. Paul MN 55164-0912 1-888-397-5824 Fax: 952-983-5193

<<DATE>>

«FNAME» «MI» «LNAME» «ADDRESS1» «ADDRESS2» «CITY» «STATE» «ZIPCODE»

Long-Term Care Insurance Change Offers

Company: <<COMPANY)>>

Policy Number: «POLICY NUMBER»

Dear «FNAME» «LNAME»:

Thank you for choosing <<COMPANY>> for your long-term care insurance needs. We value your business and are committed to being here when you need us the most.

Some long-term care insurance policies, issued by «COMPANY», are incurring a premium rate increase. The premium for your long-term care insurance policy number «POLICY NUMBER», issued on <<ISSUE DATE>> is **not increasing at this time.** However, we are offering you a few limited-time options to help manage the cost of paying for long-term care insurance.

Please note the options listed in this letter are time sensitive and require action on your part.

What is my Current Premium?

You currently pay <<CURRENT PREMIUM AMOUNT>> <<FREQUENCY>> for your long-term care insurance policy.

What are my Options?

We offer several options to help manage the cost of paying for long-term care insurance. These options are offered at <<Company>>'s discretion, and not all of them may be available to you in the future and may not be of equal value to you, so please review this information carefully. We encourage you to consult with your financial or other trusted advisor and a tax advisor before making a selection.

1. Convert to a Paid-up Policy

The Increased Contingent Non-Forfeiture Option allows you to stop paying premiums on your policy, and convert to a paid-up policy that has a reduced maximum lifetime benefit. Your reduced maximum lifetime benefits will be equal to 150% of the premiums you have paid to date, capped at your policy's current remaining maximum lifetime benefits.

To select this option, complete the enclosed Option Election Form and return to <<COMPANY>> within 60 days from the date of this notice.

2. Lower Coverage to Reduce Premium

You may have the option to lower your premiums by reducing aspects of your coverage. Please contact us at 1-888-397-5824 to discuss benefit reduction options.

3. Surrender Your Policy Coverage

This option allows you to surrender your Policy in exchange for a one-time cash payment of <<SURRENDER_PMT>>, which is based on the amount of money currently held by <<COMPANY>> to cover future expected benefit payments. If you elect this option, your Policy will be terminated, and <<COMPANY>> will no longer have to pay any benefits, even if you have already received long-term care services. You will no longer have an active insurance Policy, and it will not be eligible for reinstatement. If you elect this option, you may receive a 1099-MISC form for the tax year in which the option was executed. Please refer to the Surrender Option Election Form for additional details.

This option is available only at this time and may not be available again in the future. To select this option, complete the enclosed Surrender Option Election Form, **sign it and have it notarized** and return to <<COMPANY>> within 60 days from the date of this notice.

IMPORTANT – This option may result in a taxable event for you. Please consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.

Time to Reverse Decision

If you opt to reduce your benefits or surrender your coverage, your request to reverse any such decision must be in writing, signed by you, and received by us no more than 30 days after the date of our written confirmation of your change.

Choose the Option That is Best for You

As noted above, we are writing to advise you of **voluntary** benefit change options. If you wish to retain your current coverage without changes, you do not need to take action at this time. If you continue to pay your premium at the current amount, the terms of your coverage will not change.

We recommend that you carefully review the options available to you and contact us if you have questions. We encourage you to carefully evaluate your individual situation, the current and projected cost of care in your area, and consider speaking to your family or to a trusted financial or tax adviser before making changes to your coverage. All available options may not be of equal value. In addition, since << COMPANY>> sold policies with varying benefits to insureds of different ages, these options may be of different value to other insureds.

Please be reminded that, under the terms of your Policy, premium rates are not guaranteed. We regularly monitor experience on long-term care insurance policies and may need to implement increases in the future.

For more information regarding the options described in this letter or if you have any questions, please contact our customer service team at 1-888-397-5824 Monday through Friday, 8:00am to 5:00pm Central Time.

Sincerely,

<<OPERATIONS MANAGER NAME AND TITLE>>

Coverage Change Option Election Form

Policyholder: <<FNAME>> <<LNAME>> **Policy Number:** <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to change your coverage, check the corresponding box to indicate your choice, then **sign**, **date and return to <<COMPANY>> within 60 days from the date of this notice**. This form can be returned via mail to the address below or via fax at 952-983-5193.

Current Coverage Limits (as of < <date>>. Coverage changes made after this date are not reflected)</date>			
Current < <frequency>> Premium</frequency>	\$< <r_default_modal_prem>></r_default_modal_prem>		
Current Daily Maximum Benefit	Up to \$< <current_dmb>> per day</current_dmb>		
Remaining Maximum Lifetime Benefit	< <maximum_lifetime_benefit>></maximum_lifetime_benefit>		
Automatic Increase Benefit	< <abi_type>></abi_type>		

		Options			
Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New < <frequen CY>> Premium</frequen
	Increased Contingent Non-forfeiture ("ICNF")	\$< <curre NT_DMB>></curre 	\$< <icnf_ltm*>></icnf_ltm*>	None	\$0.00

*Note: ICNF Maximum Lifetime Benefit is based upon premiums paid as of < <date>> and will be finalized election has been processed</date>					
Signature	Date				

Please note:

- You should consider speaking to your family or to a trusted financial adviser before making changes to your coverage. You should also consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.
- If you have a limited pay policy, please consider how many more premium payments you have left before making changes to your policy.
- If you currently have the Shared Advantage Benefit and are going to make a coverage change, your spouse may need to make the same coverage change.
- Mail your completed form notarization to the following address:

<<COMPANY>> Individual Long-Term Care P.O Box 64912 St. Paul MN 55164-0912

Surrender Option Election Form

Policyholder: <<FNAME>> <<LNAME>> Policy Number: <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to surrender your Policy, check the box on this page, then sign, date, <u>obtain notarization</u> and return to << COMPANY>> within 60 days from the date of this notice. This form can be returned via mail to the address on the back of this form or via fax at 952-983-5193. Please see the other side of this form for additional information.

Current Coverage Limits (as of < <date>>>. Coverage changes made after this date are not reflected)</date>					
Current < <frequency>> Premium</frequency>	\$< <r_default_modal_prem>></r_default_modal_prem>				
Current Daily Maximum Benefit	Up to \$< <current_dmb>> per day</current_dmb>				
Remaining Maximum Lifetime Benefit	< <maximum_lifetime_benefit>></maximum_lifetime_benefit>				
Automatic Increase Benefit	< <abi_type>></abi_type>				

The surrender option offered herein is nontransferable and void upon death of the named insured. Any person who knowingly and with the intent to defraud the insurance company by electing to surrender this long term care policy and is not the named insured or legal POA is committing a fraudulent act, which is a crime, and subject to criminal and civil penalties.

		Options			
Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New < <frequen CY>> Premium</frequen
	Surrender Option	\$0.00	\$0.00	< <surrende R_PMT>></surrende 	\$0.00

THIS FORM MUST BE NOTARIZED

Signature	Date
Social Security Number:	Phone Number:
(Required for 1099MISC)	(Required for possible verification call

Please Note

- The Surrender Options is non-transferrable and can only be elected by the named insured or legal Power of Attorney if the insured has been diagnosis with a cognitive impairment. Evidence of such diagnosis may be required.
- Some elections will be subject to an additional verbal verification confirmation.
- You should consider speaking to your family or to a trusted financial adviser before making changes to your coverage. You should also consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.
- If you have a limited pay policy, please consider how many more premium payments you have left before making changes to your policy.
- If you currently have the Shared Advantage Benefit and are going to make a coverage change, your spouse may need to make the same coverage change.
- Mail your completed form with proper notarization to the following address:

<<COMPANY>> Individual Long-Term Care P.O Box 64912 St. Paul MN 55164-0912 P.O Box 64912 St. Paul MN 55164-0912 1-888-397-5824 Fax: 952-983-5193

<<DATE>>

«FNAME» «MI» «LNAME» «ADDRESS1» «ADDRESS2» «CITY» «STATE» «ZIPCODE»

Long-Term Care Insurance Premium Adjustment Notice

Company: <<COMPANY>>

Policy Number: «POLICY NUMBER»

Dear «FNAME» «LNAME»:

Thank you for choosing <<COMPANY>> for your long-term care insurance needs. We value your business and are committed to being here when you need us the most.

This letter is to inform you that the premium for your long-term care insurance coverage, issued by «COMPANY» on <<ISSUE DATE>>, is going to increase. This letter explains the amount and timing of your premium increase, and the options available to reduce the impact of the premium increase.

How much is my Premium Increase and when does my Bill Increase?

You currently pay <<CURRENT PREMIUM AMOUNT>> <<FREQUENCY>>. This premium amount will increase on the first premium due date on or after <<POLICY_INCR_EFF_DATE>>. Your premium will change as follows:

Why is my Premium Increasing?

The decision to implement a premium increase is a difficult one. <<COMPANY>>, like other long-term care insurers, used certain assumptions when originally setting the premium rate for your policy. These assumptions used the best available information at that time about a variety of factors, including the expected lifespan of Policy holders, the number of insureds going on claim, the length of time insureds would be on claim, and the cost of receiving long-term care services. These assumptions were best estimates of future experience for these policies. Unfortunately, actual experience developed differently than originally expected. More policyholders are utilizing long-term care than expected and the cost of care is higher than expected. Therefore, we have determined that we must increase premiums to reflect the future claim expectations on these policies.

The premium increase has been filed with the state in which your policy was issued, and we are implementing this premium increase in accordance with the laws and regulations of this state. The increase is not due to a change in your health, your age, or your claims history. No individual policyholder has been singled out for a rate increase. Please be reminded that, under the terms of your policy, premium rates are not guaranteed and may be increased again in the future. We will continue to monitor experience on long-term care insurance policies and may need to implement additional increases in the future.

What are my Options?

<<COMPANY>> understands that a rate increase can be difficult, and offers a variety of options to help manage or avoid the increase. These options may not be of equal value to you, so please review this information carefully. We encourage you to consult with your financial or other trusted advisor and a tax advisor before making a selection.

1. Pay the New Premium Amount and Maintain Existing Coverage

If you wish to retain your current coverage without changes, <u>you do not need to take action at this time</u>. Your new increased premium will be reflected on your bill or, if you pay via electronic funds transfer, the withdrawal amount will be adjusted to reflect the premium increase. If you continue to pay your premium at the new amount the terms of your coverage will not change.

2. Convert to a Paid-up Policy

The Increased Contingent Non-Forfeiture option allows you to stop paying premiums on your policy, and convert to a paid-up policy that has a reduced maximum lifetime benefit. Your reduced maximum lifetime benefits will be equal to 150% of the premiums you have paid to date, capped at your policy's current remaining maximum lifetime benefits.

To select this option, complete the enclosed Option Election Form and return to <<COMPANY>> by <<RATE_INC_EFF_DATE + 60 DAY>>.

3. Lower Coverage to Reduce the Impact of the Premium Increase

<Remove the Automatic Increase Benefit rider. Your policy includes an automatic increase benefit rider, which has increased your policy's daily maximum benefit amount by 5% per year to protect against inflation. You can reduce your premium if you discontinue the automatic increase benefit rider. Be assured that your policy's current benefit levels, which include the automatic increases that have already occurred, will remain intact. Please refer to the Option Election Form for additional details>>.

<Reduce your Maximum Lifetime Benefit. Your policy currently has a maximum lifetime benefit of <<MAXIMUM_LIFETIME_BENEFIT>>, which you can reduce to <<MAXIMUM LIFETIME_BENEFIT – 1 STEP>>. The total Maximum Lifetime Benefit would be based on your daily benefit amount times <<MAXIMUM_LIFETIME_BENEFIT – 1 STEP IN DAYS>>. Please refer to the Coverage Change Option Election Form for additional details>>.

Change or Drop other Benefit Features. You may have the option to lower your premiums by reducing aspects of your coverage. Please contact us at 1-888-397-5824 to discuss benefit reduction options.

4. << Surrender Your Policy Coverage

This option allows you to surrender your Policy in exchange for a one-time cash payment of <<SURRENDER_PMT>>, which is based on the amount of money currently held by <<COMPANY>> to cover future expected benefit payments. If you elect this option, your Policy will be terminated, and <<COMPANY>> will no longer have to pay any benefits, even if you have already received long-term care services. You will no longer have an active insurance Policy, and it will not be eligible for reinstatement. If you elect this option, you may receive a 1099-MISC form for the tax year in which the option was executed. Please refer to the Surrender Option Election Form for additional details.

This option is available only at this time and may not be available again in the future. To select this option, **complete** the enclosed Surrender Option Election Form, **sign it and have it notarized** and return to <<COMPANY>> by <<RATE INC EFF DATE + 60 DAY>>.

IMPORTANT – This option may result in a taxable event for you. Please consult a qualified tax professional or attorney to determine any tax impact to you. <COMPANY>> does not provide tax advice>>.

Time to Reverse Decision

If you opt to change your coverage, your request to reverse any such decision must be in writing, signed by you, and received by us no more than 30 days after the date of our written confirmation of your coverage change.

Choose the Option That is Best for You

We recommend that you carefully review the options available to you and contact us if you have questions. We encourage you to carefully evaluate your individual situation, the current and projected cost of care in your area, and consider speaking to your family or to a trusted financial or tax adviser before making changes to your coverage. All available options may not be of equal value. In addition, since <<COMPANY>> sold policies with varying benefits to insureds of different ages, these options may be of different value to other insureds.

Please be reminded that, under the terms of your Policy, premium rates are not guaranteed. We regularly monitor experience on long-term care insurance policies and may need to implement increases in the future.

For more information regarding the options described in this letter or if you have any questions, please contact our customer service team at 1-888-397-5824 Monday through Friday, 8:00am to 5:00pm Central Time.

This letter is not a bill. However, we recommend that you keep a copy of this letter with your Policy.

Sincerely,

<<OPERATIONS MANAGER NAME AND TITLE>>

Coverage Change Option Election Form

Policyholder: <<FNAME>> <<LNAME>> **Policy Number:** <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to change your coverage, check the corresponding box to indicate your choice, then **sign**, **date and return to <<COMPANY>> by <<RATE_INC_EFF_DATE + 60 DAY>>.** This form can be returned via mail to the address on the back of this form or via fax at 952-983-5193. Please see the other side of this form for additional information.

Current Coverage Limits (as of < <date>>. Coverage changes made after this date are not reflected)</date>						
New < <frequency>> Premium which includes the rate increase</frequency>	\$< <r_default_modal_prem>></r_default_modal_prem>					
Current Daily Maximum Benefit	Up to \$< <current_dmb>> per day</current_dmb>					
Remaining Maximum Lifetime Benefit	< <maximum_lifetime_benefit>></maximum_lifetime_benefit>					
Automatic Increase Benefit	< <abi_type>></abi_type>					

		Options			
Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New < <freque ncy="">> Premium</freque>
	Increased Contingent Non-forfeiture ("ICNF")	\$< <curre NT_DMB> ></curre 	\$< <icnf_ltm *>></icnf_ltm 	None	\$0.00
	Remove the Automatic Increase Benefit rider and retain your current daily maximum benefit amounts reflected above	\$< <curre NT_DMB> ></curre 	\$< <abi_redu CTION_LTM</abi_redu 	None	\$< <abi_re duction_="" emium="" modal_pr="">></abi_re>
	Reduce your maximum lifetime benefit period from < <maximum_lifetime_benefit>> to <<maximum_lifetime_benefit -="" 1="" step="">> years</maximum_lifetime_benefit></maximum_lifetime_benefit>	\$< <curre NT_DMB> ></curre 	\$< <ltm_red UCTION_LTM >></ltm_red 	None	\$< <ltm_re DUCTION_ MODAL_PR EMIUM>></ltm_re

	te: ICNF Maximum Lifetime Benefit is based u	ipon premiums	paid as of < <date< th=""><th>>> and will be fir</th><th>nalized once</th></date<>	>> and will be fir	nalized once
	•				
Sig	nature	_	Date		

Please note:

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<<COMPANY>> Individual Long-Term Care P.O Box 64912 St. Paul MN 55164-0912

Surrender Option Election Form

Policyholder: <<FNAME>> <<LNAME>> Policy Number: <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to surrender your Policy, check the box on this page, then sign, date, <u>obtain notarization</u> and return to << COMPANY>> by << RATE_INC_EFF_DATE + 60 DAY>>. This form can be returned via mail to the address on the back of this form or via fax at 952-983-5193. Please see the other side of this form for additional information.

Current Coverage Limits (as of < <date>>. Coverage changes made after this date are not reflected)</date>						
New < <frequency>> Premium which includes the rate increase</frequency>	\$< <r_default_modal_prem>></r_default_modal_prem>					
Current Daily Maximum Benefit	Up to \$< <current_dmb>> per day</current_dmb>					
Remaining Maximum Lifetime Benefit	< <maximum_lifetime_benefit>></maximum_lifetime_benefit>					
Automatic Increase Benefit	< <abi_type>></abi_type>					

The surrender option offered herein is nontransferable and void upon death of the named insured. Any person who knowingly and with the intent to defraud the insurance company by electing to surrender this long term care policy and is not the named insured or legal POA is committing a fraudulent act, which is a crime, and subject to criminal and civil penalties.

Options							
Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New < <freque NCY>> Premium</freque 		
	Surrender Option	\$0.00	\$0.00	< <surrend ER_PMT>></surrend 	\$0.00		

THIS FORM MUST BE NOTARIZED

Signature	Date
Social Security Number:	Phone Number:
(Required for 1099MISC)	(Required for possible verification call)

Please Note

- The Surrender Options is non-transferrable and can only be elected by the named insured or legal Power of Attorney if the insured has been diagnosis with a cognitive impairment. Evidence of such diagnosis may be required.
- Some elections will be subject to an additional verbal verification confirmation.
- You should consider speaking to your family or to a trusted financial adviser before making changes to your coverage. You should also consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.
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- Mail your completed form with proper notarization to the following address:

<<COMPANY>> Individual Long-Term Care P.O Box 64912 St. Paul MN 55164-0912



August 8, 2022

Valerie Romig Pennsylvania Insurance Department 1326 Strawberry Square

Harrisburg, PA 17120

Louis Scarim, ASA, MAAA **Actuarial Consulting Director** Long Term Care Pricing Telephone 312-822-6179 Email louis.scarim@cna.com

Re: Continental Casualty Company (NAIC #218-20443, FEIN#36-2114545) SERFF Tracking # CNAB-133114867 Rate Increase Filing for OP Gen1 (LTC1, Premier/Classic) Individual Long Term Care Policy Forms:

Dear Ms. Romig:

Thank you for your review of the above referenced filing. This letter is in response to your objection dated July 13, 2022. The objection items are restated below in italics, with responses in blue:

1. The Department is willing to approve your requested increase of (a) 34.5% on LTC1 policies with lifetime benefits and the AIB rider and (b) 27.3% on Premier/Classic policies with lifetime benefits and the AIB rider, but would recommend the increase be staged over two years. The Department would also recommend that any annual increase be limited to 30%.

Thank you for your consideration of this filing. We are agreeable to this offer. Please note that we have adjusted the rate increase to reflect the cost of waiting associated with spreading the increase over multiple years for the LTC1 policies with lifetime benefits and the AIB rider.

- LTC 1 policies with lifetime benefits & AIB rider: 30% in year 1; 5.9% in year 2; for a total cumulative increase of 37.7%
- Premier/Classic policies with lifetime benefits & AIB rider: 27.3% in year 1
- 2. Lastly, please provide a seriatim listing of the 588 Continental Casualty policies in this block in Excel. Each row within the worksheet must contain the policy's unique identification number, form number, series (i.e. LTC1 or Premier/Classic), issue age, issue date, inflation status indicator, benefit period, and Continental Casualty's suggested premium increase in each year of the proposed implementation period.

Please see attached seriatim listing labeled "PA Seriatim Insured – GEN1 Final.xlsx".

We also have provided a summary of the impact of the cost of waiting on the LTC1 policies with lifetime benefits and the AIB rider, along with the nationwide experience exhibit that shows the lifetime loss ratio with the rate increase spread over two years is the same as the lifetime loss ratio with the single rate increase.

Please let us know if we can provide additional information to assist in the review of this filing. Thank you for your time and consideration.

Sincerely,

Louis Scarim, ASA, MAAA

Pennsylvania Cost of Waiting Analysis

						What the
						Second Year
				NW LLR with		Increase Would
			Requested	Requested	2-Year Implementation that	be Without the
Filing	Product	Benefit Cohort	Rate Increase	Increase	Results in Same NW LLR	Cost of Waiting
GEN1	LTC1	Infl+Life	34.5%	179.9%	30% x 5.9% = 37.7%	3.46%
GEN1	Premier/Classic	Infl+Life	27.3%	156%	n/a	0.00%
GEN2	Pref Adv	Infl+Life	60.0%	136.3%	30% x 28.7% = 67.31%	23.08%
GEN2	Pref Adv	Infl+ Non-Life	35.0%	103.7%	30% x 5.5% = 37.15%	3.85%
GEN2	Pref Adv	Non-Infl+Life	35.0%	108.5%	30% x 4.9% = 36.37%	3.85%
GEN2	TQ	Infl+Life	60.0%	130.9%	30% x 28.2% = 66.66%	23.08%
GEN2	TQ	Infl+ Non-Life	35.0%	99.6%	30% x 5.2% = 36.76%	3.85%
GEN2	TQ	Non-Infl+Life	35.0%	98.8%	30% x 5.0% = 36.5%	3.85%

Exhibit 3a

Continental Casualty Company

LTC1 - Policy Forms with Lifetime Benefits & Standard Inflation

Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Lo Ratio
				Historical				
1988	-	-	0%	0%	-	-	0%	0%
1989 1990	-	-	0% 0%	0% 0%	-	-	0% 0%	0% 0%
1991	302,590		0%	0%	302,590		0%	0%
1992	3,587,588	9,289	0%	0%	3,587,588	9,289	0%	0%
1993	9,470,851	403,881	4%	3%	9,470,851	403,881	4%	3%
1994	13,338,015	3,599,530	27%	15%	13,338,015	3,599,530	27%	15%
1995	14,466,745	3,572,475	25%	18%	14,466,745	3,572,475	25%	18%
1996	13,720,183	4,046,018	29%	21%	13,720,183	4,046,018	29%	21%
1997	13,666,230	5,673,528	42%	25%	13,666,230	5,673,528	42%	25%
1998 1999	13,273,852 12,840,362	5,042,742 8,997,945	38% 70%	27% 33%	13,273,852 12,840,362	5,042,742 8,997,945	38% 70%	27% 33%
2000	12,579,372	7,017,031	56%	36%	12,579,372	7,017,031	56%	36%
2001	12,260,405	7,887,398	64%	39%	12,260,405	7,887,398	64%	39%
2002	12,687,782	10,621,595	84%	43%	12,687,782	10,621,595	84%	43%
2003	14,661,342	15,544,213	106%	49%	14,661,342	15,544,213	106%	49%
2004	19,667,634	14,107,506	72%	52%	19,667,634	14,107,506	72%	52%
2005 2006	19,345,044 17,766,441	12,226,292 20,940,736	63% 118%	53% 59%	19,345,044 17,766,441	12,226,292 20,940,736	63% 118%	53% 59%
2007	17,700,441	21,838,481	127%	64%	17,217,814	21,838,481	127%	64%
2008	16,538,509	22,219,486	134%	69%	16,538,509	22,219,486	134%	69%
2009	15,853,396	29,750,882	188%	76%	15,853,396	29,750,882	188%	76%
2010	15,005,323	25,440,540	170%	82%	15,005,323	25,440,540	170%	82%
2011	14,377,340	32,584,669	227%	89%	14,377,340	32,584,669	227%	89%
2012	14,955,795	37,022,161	248%	97%	14,955,795	37,022,161	248%	97%
2013	15,526,244	42,691,034	275%	106%	15,526,244	42,691,034	275%	106%
2014 2015	14,743,896 13,680,020	43,036,119 47,484,123	292% 347%	114% 123%	14,743,896 13,680,020	43,036,119 47,484,123	292% 347%	114% 123%
2015	13,495,170	51,310,024	380%	133%	13,495,170	51,310,024	380%	133%
2017	14,007,361	57,978,997	414%	144%	14,007,361	57,978,997	414%	144%
2018	13,063,132	63,940,742	489%	156%	13,063,132	63,940,742	489%	156%
2019	13,259,356	60,056,962	453%	166%	13,259,356	60,056,962	453%	166%
2020	12,755,846	51,364,438	403%	173%	12,755,846	51,364,438	403%	173%
otal Actual	408,113,640	706,408,837	173%	173%	408,113,640	706,408,837	173%	173%
2024	11,329,174	E6 060 020	E020/	Projected	11 015 255	EG EGE E70	4740/	4.020/
2021 2022	10,363,674	56,969,939 64,956,477	503% 627%	182% 193%	11,915,255 12,837,665	56,525,573 65,748,469	474% 512%	182% 191%
2023	9,377,562	61,009,031	651%	202%	12,285,288	61,300,759	499%	200%
2024	8,419,243	62,469,964	742%	213%	11,086,380	59,751,477	539%	208%
2025	7,495,453	63,246,341	844%	223%	9,869,941	60,494,069	613%	217%
2026	6,614,731	63,400,407	958%	234%	8,710,216	60,641,430	696%	226%
2027	5,783,791	62,925,841	1088%	244%	7,616,042	60,187,516	790%	234%
2028	5,006,716	61,648,213	1231%	255%	6,592,796	58,965,486	894%	243%
2029 2030	4,288,571	59,665,074	1391% 1566%	265% 275%	5,647,149 4,795,767	57,068,647 54,550,609	1011% 1137%	252% 261%
2030	3,642,012 3,067,876	57,032,474 53,782,831	1753%	284%	4,039,750	51,442,380	1273%	269%
2032	2,562,287	49,966,237	1950%	293%	3,373,995	47,791,872	1416%	276%
2033	2,121,095	45,788,357	2159%	301%	2,793,037	43,795,799	1568%	283%
2034	1,739,329	41,331,300	2376%	308%	2,290,331	39,532,699	1726%	290%
2035	1,411,700	36,559,279	2590%	315%	1,858,914	34,968,340	1881%	296%
2036	1,133,458	31,664,268	2794%	321%	1,492,527	30,286,343	2029%	301%
2037 2038	899,489 705,172	26,904,576 22,442,133	2991% 3183%	325% 330%	1,184,439 928,564	25,733,778 21,465,525	2173% 2312%	305% 309%
2039	545,576	18,355,792	3364%	333%	718,410	17,557,009	2444%	312%
2040	416,162	14,681,669	3528%	336%	547,998	14,042,771	2563%	314%
2041	312,736	11,475,216	3669%	338%	411,808	10,975,853	2665%	316%
2042	231,252	8,784,647	3799%	339%	304,510	8,402,368	2759%	317%
2043	168,073	6,567,672	3908%	341%	221,316	6,281,868	2838%	318%
2044	120,000	4,778,264	3982%	341%	158,015	4,570,329	2892%	319%
2045	84,121 57,913	3,396,980	4038%	342%	110,769	3,249,155 2,278,433	2933%	320%
2046 2047	39,207	2,382,094 1,666,594	4113% 4251%	342% 343%	76,259 51,628	1,594,070	2988% 3088%	320% 320%
2048	26,167	1,171,784	4478%	343%	34,456	1,120,792	3253%	320%
2049	17,288	827,684	4788%	343%	22,765	791,666	3478%	321%
2050	11,372	592,803	5213%	343%	14,974	567,006	3787%	321%
2051	7,501	434,610	5794%	343%	9,877	415,698	4209%	321%
2052	5,002	323,529	6469%	343%	6,586	309,450	4699%	321%
2053 2054	3,398 2,362	245,409 192,302	7221% 8140%	343% 343%	4,475	234,730	5245% 5913%	321%
2054	1,686	155,479	9224%	344%	3,111 2,220	183,934 148,713	6700%	321% 321%
2056	1,232	129,980	10549%	344%	1,622	124,323	7663%	321%
2057	917	108,409	11823%	344%	1,207	103,692	8588%	321%
2058	693	89,741	12956%	344%	912	85,836	9411%	321%
2059	529	76,757	14510%	344%	697	73,416	10540%	321%
2060	404	65,782	16282%	344%	532	62,919	11827%	321%
2061 2062	309 235	55,902	18100%	344% 344%	407 310	53,469 45,460	13147%	321% 321%
2062	235 177	47,528 39,960	20218% 22521%	344% 344%	310 234	45,460 38,221	14686% 16358%	321% 321%
2064	133	32,532	24474%	344%	175	31,117	17777%	321%
2065	97	25,030	25689%	344%	128	23,940	18660%	321%
2066	70	17,432	25079%	344%	92	16,673	18217%	321%
2067	48	11,322	23454%	344%	64	10,830	17036%	321%
2068	33	7,149	21966%	344%	43	6,838	15956%	321%
2069	21 13	4,366	20617% 19438%	344%	28 17	4,176 2,470	14976%	321% 321%
2070 2071	13	2,583 1,486	19438% 18518%	344% 344%	17 11	2,470 1,421	14119% 13451%	321% 321%
2072	5	828	17859%	344%	6	792	12973%	321%
2073	3	446	17349%	344%	3	427	12602%	321%
2074	1	232	17040%	344%	2	222	12378%	321%
2075	1	114	16458%	344%	1	109	11954%	321%
2076	0	51	15008%	344%	0	49	10902%	321%
2077 2078	0	21 8	13216% 11537%	344% 344%	0	20 7	9600% 8380%	321% 321%
2079	0	2	9962%	344%	0	2	7236%	321%
	88,016,077	998,512,932	1134%	1134%	112,023,724	963,661,045	860%	860%
tai Projected								
tal Projected								
tal Lifetime	496,129,717	1,704,921,768	344%	344%	520,137,364	1,670,069,881	321%	321%
				•				321%
				344% 5 12/31/2020 at Maxim 125%				321% 124.6%

8/2/2022 LTLR NW SERFF Tracking #: CNAB-133114867 State Tracking #: CNAB-133114867 Company Tracking #: PA-OP-GEN1-RA20-R1 (RATE ONLY)

State: Pennsylvania Filing Company: Continental Casualty Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other

Product Name: PA-OP-GEN1-RA20-R1

Project Name/Number: PA-OP-GEN1-RA20-R1 (RATE ONLY)/

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
01/16/2022		Rate	LTC1 Rate Supplement & Rate Sheets		LTC1 Rate Supplement and Rate Sheets - PA.pdf (Superceded)

THIS POLICY IS FOR RENEWAL BUSINESS ONLY

CONTINENTAL CASUALTY COMPANY PENNSYLVANIA LTC1 Product Portfolio Supplement to Rate Sheets for Policy Forms:

P1-15203-A37/-A87

Rates in the above forms should be multiplied by the following factors:

Cumulative Rate Increase		
Automatic Increase Benefit Rider	Benefit Period	Factor
Inflation	Lifetime	4.092115
Inflation	Non-Lifetime	3.042464
Non-Inflation	Lifetime	3.042464
Non-Inflation	Non-Lifetime	3.042464

These amounts reflect the following prior approved and current rate increases:

Prior Approved Rate Increases				
Automatic Increase Benefit Rider	Benefit Period	Approval Date	Effective Date	Amount Approved
All	All	6/28/2002	1/1/2003	15.00%
All	All	7/10/2003	1/1/2004	40.00%
All	All	9/2/2011	2/1/2012	11.80%
All	All	9/2/2011	2/1/2013	11.80%
All	All	3/23/2016	9/1/2016	20.00%
All	All	4/3/2018	10/1/2018	9.54%
All	All	4/3/2018	10/1/2019	9.54%
All	All	8/22/2020	2/1/2021	5.00%

Current Rate Increase			
Automatic Increase Benefit Rider	Benefit Period	Amount	
Inflation	Lifetime	34.5%	
Inflation	Non-Lifetime	0.0%	
Non-Inflation	Lifetime	0.0%	
Non-Inflation	Non-Lifetime	0.0%	

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 2 YEARS

I SSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
AGE 18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80		PERIOD 16 18 21 31 50 60 65 70 77 85 93 103 116 130 146 163 183 204 228 250 274	
81 82 83 84		308 341 380 420	266 295 330 363

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 4 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44	19	. 18	17
45-49	21	20	19
50-54	26	24	23
55-59	39	37	34
60-64	65	61	57 57
6 5	81	76	70
66	88	82	75 75
6 7	97	90	82
6 8	107	100	91
6 9	119	110	100
70	132	122	111
71	148	137	124
72	167	153	139
73	189	174	157
74	214	197	177
75	242	222	199
76	272	249	224
77	305	279	250
78	342	312	279
79	380	347	311

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 6 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44	20	19	18
45-49	22	21	20
50-54	28	27	25
55-59	43	40	38
60-64	72	6 8	64
65	91	85	79
66	98	93	85
67	109	102	94
6 8	121	113	104
69	134	125	115
70	149	140	127
71	166	15 5	142
72	188	175	159
73	213	198	180
74	241	224	203
75	271	252	229
76	306	283	256
77	343	318	287
78	382	354	320
79	425	394	354

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: LIFETIME

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
44.44			21
18-44	23	22	23
45-49	25	24	
50-54	33	31	30
55-59	50	48	45
60-64	86	82	77
6 5	108	104	96
66	118	113	104
67	130	124	114
68	144	138	127
69	159	152	140
70	177	170	155
71	199	190	173
	2 2 4	214	194
72 72		241	219
73	252		247
74	285	271	
75	320	305	277
76	359	342	310
77	401	382	346
78	446	425	385
79	495	471	427

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 1 YEAR

ISSUE AGE	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
80	193	161
81	215	179
82	238	198
83	264	220
84	291	242

CONTINENTAL CASUALTY COMPANY CNA Plaza, Chicago, IL 60685 Rate Sheet For Pl-15203-A37 Long-Term Care Policy

Rates shown are for Health Rating Group I. Rates for Health Rating Groups II, III, and IV are calculated by multiplying Health Group I rates by 1.15, 1.60 and 2.00, respectively.

CONTINENTAL CASUALTY COMPANY CNA Plaza, Chicago, IL 60685 Supplement to Rate Sheet For P1-15203-A37 Long-Term Care Policy

MULTI-LIFE DISCOUNT

A. A 10% discount to the rates will be made if the following conditions are met:

For Associations of 200 lives or more:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. Minimum of 10 lives must be submitted.
- B. A 5% discount to the rates will be made if the following conditions are met:

For Associations of less than 200 lives:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. Minimum of 10 lives must be submitted.

SPOUSAL DISCOUNT

A 10% discount to the rates will be made if the following conditions are met:

- 1. Discount is applicable to all lives regardless of Health Group.
- 2. If both spouses apply for coverage simultaneously and are both issued, discount applies to both policies.
- 3. If one spouse already has coverage and the other spouse applies and is issued, discount will apply only to the second policy.

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 2 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84	2 1 4 7 16 22 25 28 31 35 39 42 45 49 55 59 62 66 71 75	2 1 3 7 14 21 23 27 30 33 37 41 43 48 52 57 61 65 69 74 77 80 85 90 96	1 1 2 5 11 17 18 22 24 26 30 32 36 37 40 44 48 51 53 54 57 61 62 63 66

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 4 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44	3	3	2
45- 49	3 3 5	3 3 6	2
50-54	5	6	4
55-59	11	11	10
60-64	24	23	19
65	34	31	27
66	38	35	31
67	42	39	35
68	47	43	39
69	52	48	43
70	58	53	47
71	64	58	52
72	71	65	57
73	76	71	63
74	83	75	68
75	90	82	73
76	96	89	79
77	104	95	86
78	109	102	91
79	118	108	97

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 6 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44	4	4	4
45-49	5	4 5 6	4
50-54	5 7	6	. 6
55-59	14	14	12
60-64	30	28	24
65	42	39	35
66	47	43	39
67	5 1	47	43
68	57	53	47
69	64	59	53
70	71	64	59
71	79	73	65
72	85	79	73
73	93	86	78
74	101	93	85
75	110	101	92
76	117	109	99
77	125	116	106
78	136	125	114
79	144	133	123

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: LIFETIME

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
Aul	T LIVIOD	TENTOD	TERTOS
18-44	5	5	. 5
45-49	5 7	5 6 9	6
50-54	9	9	8
55-59	20	19	17
60-64	38	37	33
6 5	53	50	46
66	58	56	50
67	65	63	57
68	73	69	62
69	82	78	70
70	90	84	78
71	98	93	85
72	107	102	94
73	117	111	102
74	127	121	110
75	137	131	119
76	148	141	129
77	159	152	139
78	171	163	149
79	183	174	159

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 1 YEAR

ISSUE AGE	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
80	42	33
81	43	35
82	44	36
83	46	35
84	47	36

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 2 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44	3 3 6	3 3 5	2 2 4 8 17
45-49	3	3	2
50-54 55 50		5	4
55-59 60-64	11 24	11	8
65	34	22 31	17 25
66	37	31	25 28
67	42	38	32
68	45	42	35
69	50	46	38
70	54	51	42
71	58	55	45
72	63	59	48
73	68	64	51
74	73	69	55
75	77	75	59
. 76	82	78	63
77	86	83	67
78	92	87	68
79	95	92	69
80		94	72
81		98	75
82		102	76
83		107	77
84		112	80

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 4 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44 45-49	4	4 5 8	4
50-54	5 8		4 7
55-59	17	15	15
60-64	36	33	29
65	50	45	40
66	55	50	45
67	60	56	50
68	67	60	54
69	73	67	59
70	80	73	65
71	88	80	71
72	94	88	77
73	102	93	83
74	109	99	89
75	116	106	95
76	124	113	101
77	132	121	108
78	138	128	114
79	146	134	120

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 6 YEARS

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44	6	6 7	5
45-49	7		6
50-54	10	9	9
55-59	21	20	18
60-64	44	40	36
65	59	56	50
66	66	6 0	56
67	72	66	60
6 8	79	73	66
69	88	81	73
70	96	8 8	80
71	105	96	87
72	113	104	95
73	122	113	102
74	130	121	110
75	140	129	117
76	148	138	125
77	157	145	133
78	167	155	140
79	177	162	150

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: LIFETIME

ISSUE AGE	O DAY ELIMINATION PERIOD	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
18-44 45-49 50-54	8 9 13	8 9 14	7 8 12
55-59 60-64 65	29 55 75	28 53 71	25 47
66 67	82 90	78 86	64 70 78
68 69 70	99 109	95 104	85 94
71 72	120 129 139	113 123 133	103 112 122
73 74 75	151 161	143 155	130 140
76 77	173 185 196	164 176 186	150 160 171
78 79	208 221	199 210	181 192

HEALTH GROUP I NO PRIOR HOSPITALIZATION REQUIRED BENEFIT PERIOD: 1 YEAR

ISSUE AGE	30 DAY ELIMINATION PERIOD	90 DAY ELIMINATION PERIOD
80	53	43
81	54	44
82	55	45
83	56	44
84	56	45

CONTINENTAL CASUALTY COMPANY CNA Plaza, Chicago, IL 60685 Rate Sheet For R1-15205-A37 prehensive Home Health Care Ride

Comprehensive Home Health Care Rider HEALTH GROUP I Annual Rate for each \$10 Home Health Care Maximum Benefit

AHHUU	Nace	101	Cacii	DIO	HOME	nea i un	Care	riax illiulii	petier i	L

ISSUE AGE	750 VISIT <u>BENEFIT</u>	1500 VISIT BENEFIT	LIFETIME BENEFIT
18-44	21	27	34
45-49	23	29	36
50-54	24	30	38
55-59	31	40	50
60-64	44	55	70
6 5	49	61	78
66	50	65	81
67	53	68	86
6 8	57	73	91
69	60	77	98
70	64	82	105
71	69	89	114
72	75	97	123
73	82	105	134
74	89	114	145
75	97	124	15 7
76	105	135	170
77	114	146	185
78	125	160	202
79	135	172	220
80	147		
81	159		
82	174		
83	191		
84	206		

CONTINENTAL CASUALTY COMPANY CNA Plaza, Chicago, IL 60685 Rate Sheet For R1-15205-A37

Comprehensive Home Health Care Rider HEALTH GROUP I

Annual Rate for each \$10 Home Health Care Maximum Benefit Add if Simple Automatic Increase Rider R1-59439-B present

ISSUE AGE	750 VISIT <u>BENEFIT</u>	1500 VISIT <u>BENEFIT</u>	LIFETIME BENEFIT
18-44 45-49 50-54 55-59 60-64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84	5 5 7 10 13 16 18 19 20 23 25 26 28 28 30 31 33 35 36 39 41 45 46 46	7 6 10 12 18 23 22 24 25 29 32 33 35 36 38 39 41 44 46 52	8 12 17 23 28 30 32 35 36 39 40 43 45 48 51 54 56 60 63
84	46		

CONTINENTAL CASUALTY COMPANY CNA Plaza, Chicago, IL 60685 Rate Sheet For R1-15205-A37 Comprehensive Home Health Care Rider HEALTH GROUP I

Annual Rate for each \$10 Home Health Care Maximum Benefit Add if Compound Automatic Increase Rider R1-16185-B present

ISSUE _AGE_	750 VISIT <u>BENEFIT</u>	1500 VISIT BENEFIT	LIFETIME BENEFIT
18-44 45-49	7 6	8 8	9 10
50-54	9	12	14
55-59	14	17	23
60-64 65	18	24	31
66	23 25	31	38
67	26	32 33	41 43
68	27	35 35	43 46
6 9	30	39	40 49
70	33	42	51
70 71	35	42 44	53
72	35 37	46	57
73	37 37	47	57 59
74	39	49	62
75	41	52	65
76	42	5 2	68
77	43	55	69
78	46	59	74
79	48	63	78
80	50		. •
81	53		
82	54		
83	53		
84	55		